

APPENDIX 5

FWP RESPONSES TO PUBLIC COMMENTS AND REPRESENTATIVE COMMENTS

Summary of Public Involvement on the Draft EIS

Background

In March 2003, FWP began accepting comments on the Draft EIS with the proposed action that the “State of Montana will develop and implement a wolf conservation and management program.” The Updated Council Alternative was identified as FWP’s preferred. FWP designed a 60-day public comment period to ensure wider opportunity and more time for the public to participate. FWP conducted 14 Community Work Sessions across Montana from March 27-May 1, 2003 in which the public was invited to provide oral comments. FWP also provided opportunities for the public to provide written comments on line via the FWP website, in addition to sending letters or postcards via postal mail and FAX. The comment period closed on May 12, 2003.

During this public comment period, FWP asked the public to be more specific in their feedback to FWP. They were asked to identify which alternative/s best addressed their concerns about the future of wolf conservation and management in Montana and why. FWP also asked them to identify what, if anything, they would modify about the alternative so that it better addressed their concerns. FWP prepared pre-printed post cards with these questions and made them available at all the Community Work Sessions as well as all the FWP Regional Headquarters offices. The FWP website also offered an identical format with the same two questions. To that end, many of the comments below will appear in two parts with a #1 and #2 in the text. The reader is reminded to keep this in mind while reviewing the comments below; otherwise the context may be lost.

About 500 people attended the Community Work Sessions (478 actually signed in), compared to about 800 during the issue scoping work sessions in 2002. It seemed that only 30-50% of these attending in 2003 had attended during 2002. Work session participants were able to learn more about the issues and alternatives during an open house immediately prior to the comment session and during an opening set of remarks by FWP in which the alternatives were described and attendees could follow along and take notes on a handout. A total of 1,595 comments were recorded during the sessions (compared to 2722 in 2002). The total number of written letters and emails received was also fewer than in 2002.

How the Comments were Processed

Comments received during the work sessions (in 2002 and 2003, respectively) were entered into a data file as they were written down that night on the flip charts or as the attendee wrote them on a pre-printed comment card. Spelling and grammar were corrected upon entry into the computer database. Each comment was assigned a unique record number through the “auto number” function in Access.

Upon receipt, each comment letter or postcard received via postal mail or FAX was assigned a unique number manually using a traditional stamp and inkpad system.

Because of the high volume of emails received during the 2002 scoping comment period, FWP contracted with an independent provider for the receipt and data storage of all emails received through the FWP website. The raw data file was transferred to FWP for all processing at the close of the comment period. Email comments were transferred to their own data file in Access and numbered using the “auto number” function. Emails received by FWP personnel directly and independent of the contractor were processed with the written letters received via postal mail.

All comments were read by one person and most were read by two people. Because FWP asked for feedback specifically about the alternatives, all the comments were generally more complicated and detailed than those received during issue scoping. In addition, the comments often referenced more than one alternative and many different issues.

Each comment was assigned to a key word category (i.e. each alternative and the same issue categories as used during scoping) by only one person. This assignment was also incorporated into the comment database files. This allowed broadly defined grouped of comments to be summarized, catalogued, and considered together systematically. It also allowed issues to be ranked according to the frequency with which they were mentioned. Because key word summaries represent issues/concerns mentioned in each public comment/letter/postcard and each individual comment may have had more than one issue or alternative mentioned, the summary statistics presented by key word alternatives / issue categories will represent some duplication. In other words, the total number of emails, letters, flip chart comments, and postcards will be smaller than the total number of comments (or statements) processed according to the key word categories (alternatives and issues).

Many comments were general and did not mention a specific alternative. Many seemed as if the individual was not familiar with what FWP was proposing in the preferred alternative. The expressed preferences or sentiments of many of these comments are consistent with the preferred alternative.

This appendix presents a short summary of the comments on the alternatives and all of the key issues, followed by FWP's response to the substantive issues raised by the public. FWP received many comments that were similar or repetitive in that they raise the same issues. Because of the significant degree of overlap between comments on the alternatives and general comments on the issues, most of FWP's responses are presented under the key issues instead of the alternatives. If FWP didn't respond to a comment under the respective alternative, the reader should look under the issue for a more specific and exhaustive response. FWP received a significant number of comments on the Draft EIS. Therefore, only a representative sample is included in this appendix. The project file contains a complete record of all comments received by FWP.

Summary of Public Comments on the Alternatives and FWP's Response

Alternative 1, No Action

Summary of Comments: Most comments supporting this alternative indicate that it's premature to delist wolves and that USFWS hasn't satisfied ESA requirements to recover wolves. Many reference an unfavorable political climate in Montana (i.e. recent wolf-related discussions and actions taken by Montana's 2003 Legislature and county commissions). Some comments also cite "anti-wolf rhetoric" from some elected officials and the public and suggest that attitudes need to change before states can be allowed to take over management. Furthermore, some comments indicate either a lack of trust in FWP's stated intentions to maintain a recovered population or a lack of confidence in FWP's training and ability to manage wolves. Still other comments indicate a lack of support for this alternative based on a desire to end USFWS's continued involvement with wolf recovery and management in Montana and a belief that the time has arrived to delist wolves and transfer management authority to the State of Montana.

A smaller number of comments supported this alternative because it "saddles" the USFWS with the "burden" of managing wolves over the long term. These comments do not support FWP assuming management authority and urge the continuation of federal management.

Response: Whether or not USFWS has satisfied ESA requirements is beyond the scope of this EIS and FWP's authority. FWP believes, however, that USFWS has met its requirements and that wolves are biologically recovered. The federal recovery requirements call for a total of 30 breeding pairs for three consecutive years in the three recovery areas combined. A breeding pair is defined for the purposes of recovery as an adult male and an adult female with at least two pups on December 31. Under this alternative in which the FWP would not adopt and implement a state wolf program, the federal government would stay involved because ESA is a federal statute and the gray wolf is a federally protected species. USFWS is the federal agency responsible for carrying out ESA mandates.

FWP is prepared to assume management responsibility because wolves are now a part of Montana's landscape and will continue to inhabit Montana. FWP is the appropriate state agency to manage resident wildlife. FWP concedes its lack of direct experience with wolf management. FWP, however, has managed other wildlife in the presence of wolves for many years. FWP has gained additional experience through cooperative involvement in ongoing wolf-ungulate studies, the Northern Yellowstone Working Group, and through this planning process. FWP regrets that some are skeptical about its intentions and goals for wolf conservation and management in Montana. FWP also regrets that wolf conservation and

management is such a controversial issue. FWP hopes to show that, through balanced and responsive implementation, there is more to gain through good faith cooperation among all interested parties than through political divisiveness. By responding and resolving conflicts while meeting the ecological requirements of gray wolves, FWP has made the commitment to fulfill its legal requirements to maintain a secure, recovered population. Upon delisting, Montana's state laws will provide legal protection for wolves as a "species in need of management." The FWP Commission will approve the necessary administrative rules. The Montana Legislature will establish the penalties for illegal activities.

One comment supports this alternative and states that the breeding pair benchmark of the other alternatives is arbitrary and capricious. The No Action alternative is the continuation of the federal recovery program. Wolf numbers in that alternative are as per recovery criteria established in the original wolf recovery plan and projections published in the Yellowstone Reintroduction EIS. The number of wolf pairs in the Minimum Wolf Alternative is based on the premise that Montana would maintain its minimum commitment (or 10 breeding pairs) to the tri-state total of 30. The 15 breeding pairs in the Updated Council Alternative is based on the recommendations of the Interagency Technical Committee that served the Montana Wolf Management Advisory Council during its deliberations. The Technical Committee also consulted with other wolf experts. Their recommendation was based on the premise that 15 breeding pairs would be a minimum for a viable population that would still allow management flexibility and implementation of most tools being considered by the Council. FWP, in response to public comment, wanted to include and analyze an alternative that called for "more" wolves and choose to present one with 20 breeding pairs as the adaptive management benchmark. FWP arbitrarily selected 20, but could've just as easily analyzed 17, 25 or 100. A total of 20 pairs was five more than the preferred alternative and twice as many as the Minimum Wolf Alternative.

Another comment expresses concern about how FWP will address the public's fear and resulting hostility towards wolves and that the wolf program should stay with the federal officials because state officials may not be able to address it adequately. The preferred alternative outlined the need for and described FWP's commitment to an active information/education component. Through public outreach, FWP hopes that public hostility towards wolves will transition to acceptance.

Representative Comments:

W386: Say no to alternative #1 (group agreed)

W1235: Don't want fed government involved. No trust. Don't like alternatives that have federal involvement

W69: Alternative #1, No Action. Do not delist. The wolf is not sufficiently recovered to begin managing them as a furbearing animal.

W94: Alternative #1 – wolves have not recovered and removal from threatened and endangered list is premature.

L0022: Under no circumstances should alternative #1 be allowed.

L0035: Until such time as wolves occupy more of their original territory in greater numbers, FWP should not adopt a management plan. No Action!

L0036: Only "no action" appears to satisfy the basic legal and biological requirements of ESA. Any action alternative should adopt the principles of sound conservation biology. FWP should not adopt a wolf conservation and management program until these minimum standards have been met.

L0037: USFWS has spent millions to establish these wolves in Montana, and now that the wolf population is multiplying rapidly, they want to dump this mess on Montana. FWP proposes to accept this responsibility and this should be refused for the following reasons. 1. Money. Montana does not have \$800,000 to spend on wolf management and it certainly won't have the ever-increasing money needed as these wolves increase. Managing these wolves is not a Montana responsibility – it's a federal responsibility

L0045: After reading the draft, I am more than ever convinced that the USFWS should not delist the wolf. The wolf has not been sufficiently recovered to delist and turn management over to the states. I have no confidence that wolves will be protected or further restored once federal protections are removed.

L0092: The gray wolf should not be delisted. Their recovery is not sufficient. Delisting at this time would put the state legislatures on the starting blocks to completely eliminate wolves.

L0125: The title of the plan implies that wolves are to be maintained in the state of Montana and not allowed to become endangered. But it seems that several counties have already voted wolves to be "unacceptable" in their counties. We have a lot of fear that if wolf management is turned over to the states, wolves will soon be eradicated as they have been in the past.

L0188: The removal of federal protection for the wolf is premature at this time. In Montana, there is significant hostility and fear directed at this species. The local governments of Phillips and Fergus counties have stated that "wolves constitute a menace to society that cannot be tolerated. Dan Fuchs sponsored house bill 283. If this is an example of what the wolves will have to deal with in the struggle to survive, it appears that FWP hasn't

done the necessary public outreach to assure that when the wolves are delisted they aren't slaughtered and have to be relisted again. FWP revenue is directly linked to sale of hunting licenses. Since wolf recovery depends on prey species, FWP would be pressured by hunting interests to aggressively manage. While I think that the State of Montana should be permitted to manage the wolf along with other wildlife species, the draft EIS suggests that they cannot be trusted with that responsibility at this time.

L0205: Alternative 1 keeps the wolf listed – which is not good.

L0315: I strongly support alternative 1. I strenuously object to turning over de facto control of the wolf population to the likes of legislators. Those in Idaho and Wyoming are on record in favor of slaughter on sight. Those in Montana differ only in that they have better control over their tongues than their colleagues in Boise and Cheyenne. Therefore, I prefer alternative 1, leaving the management unchanged on the theory that a change to proactive/somewhat more pro-wolf management attitudes would occur.

L0080: Alternative 1 because the breeding pair benchmark set in the other alternatives is arbitrary and capricious.

E29: I think what scares me the most about taking the wolf off the endangered species list is that the public WILL NOT pay attention to the fact that they are still under management and that they will look at it as an OPEN HUNTING SEASON.

E51: I do not think the state of Montana can be trusted to manage the wolves in a manner that will provide any protection to the wolves at all. Rather the protection safety needs or value of the wolves would almost assuredly run a distant LAST in any and all instances where a decision between wolves or cattle ranchers would need to be made. Montana state elected and appointed officials do NOT have a good track record in their concern for wildlife or wilderness or anything concerning environmental issues in general. Nor do they respect the will of the people unless it supports what they intend to do anyway. So even though public support for the protection of wolves has been shown to exist, it would have little or not impact on actions the state would not doubt take to jeopardize the wolves' existence.

E70: No action. Wolves should remain on the Endangered species list until their populations are truly stable. Wolves continue to be killed on a regular basis and sometimes entire packs at a time. At this rate, if the wolves do not have the protection of the ESA, the entire population will be destroyed again. When there is no longer the stigma of a huge fine and possible jail time for killing wolves, wolves will be in much greater danger than they are now. None of the western states where wolves have been reintroduced have shown their interest, ability, or integrity to take on the management of wolves in their state.

Alternative 2, Updated Council, FWP Preferred

Summary of Comments: This alternative, based on the work of the Montana Wolf Management Advisory Council, is FWP's preferred alternative. It generated the greatest number of comments compared to the other alternatives. Overall, comments show support across a diversity of interests and locales in Montana. It is seen by many as balanced and fair to all stakeholders. Many comments, however, do show an inclination towards other alternatives (generally Alternatives 3 and 4) but also state a willingness to accept #2. Many comments acknowledge the need for management flexibility and the importance of FWP responding to local concerns. Comments opposing this alternative frequently mention support for one of the other alternatives.

Many comments suggest modifying the Updated Council Alternative. A change in the number of breeding pairs is frequently mentioned. Suggested changes are to drop the breeding pair standard from 15 to 12, 13, or even to 10 as presented in Alternative 4, or, conversely, to raise the standard from 15 to 20 or 30 breeding pairs. Reasons given for the change are that 15 is either "too high" or "too low". Another suggested change calls for FWP to establish a "zone" to limit wolf distribution to western Montana, similar to that described in Alternative 4. There is a localized concern that there could be plans to reintroduce wolves to the Missouri River National Monument and the Charlie Russell National Wildlife Refuge in the central prairie region of Montana.

Another proposed change is the source of the funding for the program – many comments desire to see the program supported by 100% federal funding, with no state or private contribution. Others comments say that the state should put revenue collected through the regulated harvest program back into the wolf program. Others highlight a concern that funding sources (whether public or private) are apt to have "strings" attached which might unacceptably constrain the program.

FWP also received comments opposing this alternative. One subset does not support FWP assuming management responsibility. Another subset does not support it because it is "too liberal" or favorable towards wolves. FWP also received comments that the Draft EIS is too general and vague and that the preferred alternative does not provide enough detail for reviewers to provide meaningful comments.

Response: The USFWS has determined, and others agree, that the gray wolf population of the northern Rockies has met the recovery goal and can be delisted, with management authority being transferred to the respective states where wolves

reside. FWP is prepared to assume management responsibility because wolves are now a part of Montana's landscape and will continue to inhabit Montana. FWP is the appropriate state agency to manage resident wildlife. FWP and Montana citizens are concerned that if the wolf remains on the endangered species list, federal agencies – or the federal court system could independently determine Montana's wolf management program without addressing the sentiments of the people of Montana. By developing and adopting a state wolf conservation and management plan along with adequate regulations (and in conjunction with similar plans and regulations in Idaho and Wyoming), USFWS will delist the wolf from ESA. A state-run program of an officially recovered population will be far more flexible, adaptable, and responsive to the diverse needs and expectations of Montanans and its visitors. FWP explicitly states its commitment to maintaining Montana's portion of the recovered wolf population in the northern Rockies, recognizing the gray wolf as a native species, and integrating wolves into Montana's wildlife heritage. The reader is referred to later sections of this appendix for additional information on FWP's responses to comments on specific issues as they relate to this alternative.

Because the people of Montana have a significant stake in the future management of wolves, they were provided an opportunity to deliberate issues related to wolf recovery and management. Former Governor Marc Racicot appointed the Montana Management Advisory Council to advise FWP regarding wolf management. FWP expanded the opportunity for everyone to participate through the development of this EIS. The preferred alternative that emerged from the Council's work and the input that FWP received through the public comment opportunities reflects the public's desire for FWP to conserve and manage wolves in a way that addresses their concerns and allows FWP the flexibility to meet the needs of both wolves and people. It also reflects Montanan's willingness to work together to build a successful program.

Most importantly, the adaptive management framework described in the preferred alternative allows FWP to adjust management to accommodate Montana's highly variable landownership patterns, highly variable levels of social tolerance in time and space, differing land uses, and differences in wildlife habitats and prey species distribution. While FWP is aware of the criticism that this alternative is too vague, the wide variety of habitats suitable for wolf occupancy, and the variation across the physical, human and political landscapes of Montana make it such that a cookie-cutter approach to wolf management would not be practical nor effective because one set of management tools will not be appropriate everywhere and in all circumstances. When the number of breeding pairs is greater than 15 pairs, liberal tools such as special kill permits for problem wolves or regulated harvest become available. FWP has more flexibility in resolving wolf-livestock conflicts that may include lethal control techniques when wolf numbers are higher, and particularly on private lands. If the number of breeding pairs is 15 or less, FWP would select more conservative management tools, particularly on public lands. Examples are discontinuing regulated harvest opportunities or being very conservative in the number of special kill permits are issued in lieu of concerns for the security of the population to maintain itself. FWP believes that a minimum of 15 breeding pairs is required prior to using liberal management tools because FWP does not want to jeopardize the security of the population. The additional breeding pairs above the minimum required will provide FWP the flexibility to manage in ways most responsive to local concerns without risking a need to relist the species under ESA.

Several comments point out that this alternative does not have an upper limit to the wolf population, nor is wolf distribution zoned. FWP clarifies that the benchmark of 15 breeding pairs in the preferred alternative does not function as a population "cap" in that the population would be limited to being only 15 breeding pairs in size. The benchmark serves as a signal to managers that an adjustment in management decisions should be made, either in the more liberal or conservative direction. A more objective basis for decision-making is established by using a benchmark signal. The impacts analysis of this alternative indicates that there would be more than 15 breeding pairs present in Montana in 2015 if all the predictive assumptions are valid and the population performs as FWP assumed it would in response to implementation of the specific conservation and management tools. The preferred alternative seeks a balance between the biological needs of wolves and the concerns of people. The adaptive framework allows FWP to conserve and manage wolves within the context of human social tolerance, wolf ecology, and Montana's requirement to sustain a recovered population by letting wolves find their place on the landscape. FWP considered capping wolf numbers and zoning wolf distribution in Alternative 4 and agrees with the recommendations of the Advisory Council that it would not only be unrealistic to manage for a maximum number of wolves in Montana, but that to do so would be inconsistent with how other wildlife in Montana are managed. In addition, the intermingled landownership patterns and land uses, in light of the ability of a wolf to travel long distances even in a single day, make it impractical to "zone" wolf distribution based on distinctions between public and private lands or certain land use or ownership patterns.

Several comments mention the need to more strictly regulate the ownership of captive wolves and wolf-dog hybrids. See the Hybrids section below.

Some comments question the role of USDA Wildlife Services and whether it was possible to discontinue its involvement with wolf conservation and management in Montana. Montana statutes charge both FWP and Montana Department of Livestock (MDOL) with resolving conflicts and damages to private property caused by wildlife. Therefore, MDOL will be involved in wolf management in Montana either directly or indirectly. Damages caused by other large carnivores (e.g. mountain lion, black bear) are presently handled by USDA WS through a Memorandum of Understanding between FWP and MDOL. The preferred alternative would have FWP contract WS to address wolf-conflicts through MDOL in lieu of FWP personnel.

Some comments express concern over the provisions that wolves in Montana could be hunted or trapped at some time in the future. The preferred alternative describes that wolves will be reclassified under state statute as a “species in need of management” upon delisting. When it becomes biologically appropriate to do so, FWP and the FWP Commission will consider reclassifying the gray wolf as a big game animal or a furbearer and establish regulations by which licensed members of the public could harvest a wolf. Harvest programs would be managed in a biologically sustainable manner and will not jeopardize the population. Early on, FWP will be conservative, ensuring that implementation of the other aspects of its wolf conservation and management program is going smoothly and that other mortality sources are not excessive, causing the population to require ESA protections in the future.

One comment notes the appropriateness of recognizing Indian tribes’ authority on the seven reservations in Montana. Tribal authorities will determine wolf management on reservations. Managing wildlife populations that range across jurisdictional boundaries is always challenging. In the case of a wide ranging species such as the gray wolf, FWP will coordinate with other agencies and tribes to resolve any concerns about how cross boundary packs would be managed or how conflicts would be resolved to make sure that national park, provincial, tribal, as well as individual state, and tri-state goals are met.

One comment states that the preferred alternative does not provide enough detail on what protections would be afforded to wolves under the state classification as a “species in need of management.” FWP clarifies that it has the authority, in conjunction with the FWP Commission to undertake administrative rule-making to establish those regulations. Typically, FWP prepares a management plan first and then adopts the administrative rules consistent with the plan. The preferred alternative confirms that FWP would seek state legislation to make the unlawful taking of a gray wolf a misdemeanor under MCA 87-1-102. FWP would also see legislation to include the gray wolf under the restitution sections of MCA 87-1-111. FWP confirms that the adoption of penalties and fines under Montana law, in addition to FWP Commission rules is consistent with the Council’s recommendation that law enforcement be a high priority, that illegal activity be discouraged, and that penalties be similar to unlawful activities for black bears and mountain lions.

Representative Comments:

W4: Alternative 2 is realistic.

W14: 1. #2 – gives FWP broader range of management choices. 2. This program be totally funded by the federal government.

W83: Alternative #2 – like to see flexible tools defined. When can they implement which tools? Should be defined in the final plan.

W157: Alternatives #2 has hunting and trapping – is that a reality? And if not due to outside pressure, will there be a special state kill permit that is protected from such pressure?

W84: Implement alternative #5 in the interim. Then go to alternative #2 after delisting.

W352: Under alternative #2, take out section on private/public funding and make it federal funding.

W359: Because 10 offers less flexibility, use 12. Like alternative 2.

W488: I like alternative 2, but it’s a little more liberal than I would like. The reason I like it better than 4 is because I don’t want it back on the list. It’s important to deal with local problems, like a kill permit for the landowner.

W537: I like alternative 2. I like the idea that Montana will be running the show rather than the feds dictating. I like giving stockowners the tools to handle problems.

W564: As a livestock producer, I like alternative 2 because there is compensation, landowner flexibility to protect livestock and the fact it provides for regulated harvest.

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W598: Concern that alternative 2 has no upper limit.

W812: Zone approach would be better than a #'s approach on alternative 2.

W826: I like alternative #3 the best with the addition of compensation plan. But I think #2 is most reasonable because it balances the need of having wolves in Montana and the landowner and livestock owners' needs.

W993: I don't want #5 to be our long-term objective, but we would like to see it until we can get #2 in action.

W994: I would support something between #2 and #4 – do we need 15 or 10 as a benchmark?

W996: I like alternative 2 – I don't like 20 pairs. I think 20 is pushing it.

W1302: money is my biggest concern. Alternative 2 is fine.

W1328: must have an alternative for everyone. Agriculture community could live with alternative 2. But add zones as in alternative #4. Manage migrating wolves more aggressively. Must delist first.

W1346: Alternative #2 with 20 pairs or Alternative #3 with compensation. Need to deal with hybrids.

W1438: Prefer #4, like idea of protecting private property. Concerned could get relisted under this option. Therefore would prefer #2.

W9: I like alternative #2, but FWP should take over before delisting if litigation takes time.

W13: #2 – but how many wolves do we actually need?

W21: Alternative 2. I am looking for FWP to manage wolf just like other wildlife. I am looking for management based on science, not politics. If one of the states fails to meet the plan request then our plan #5.

W54: Alternative #2 will get the wolf delisted and they will need to be managed and compensation must be made to ranchers, packers and others who suffer financially for losses due to wolf kill of cattle and wildlife. Why need the federal officials respond to livestock conflicts? Is there no way to get the federal government out of the project?

W62: Alternative seems to address the concerns of all sides. There would be about the same amount of wolves as now and compensation is possible for stock growers. In the mean time, alternative 5 would work. I would like to see more wolves in alternative #2 – increase to 20.

W121: alternative #2 with 10 pair. Feds should pay all the costs – they put the wolf here.

L0022: The appropriate action is to implement alternative #4. This will be in the best interest of our state's citizens. If this cannot be done, then alternative #2 is acceptable.

L0023: I would prefer you choose option #3 and I actually hope you expand the breeding pairs allowable. My second choice would be the alternative now preferred by you, option #2. I am adamantly opposed to both options #1 and #4.

L0070: The first major flaw I see is in setting the management benchmark at 15 breeding pairs. In light of the estimate that there are currently 14 breeding pairs in Montana, this allows for little growth before heavy-handed management can step in to remove, kill, and rearrange. This also implies that the number is based on pacifying special interest groups like ranchers and hunters, rather than allowing growth when the ecosystems of Montana can surely support more than this number as in #3. The second serious problem that I find with the preferred alternative is that it does not outline appropriate ways to handle the concerns of ranchers and livestock depredation. Emphasis needs to be placed on preventative measures, such as electric fences or guard animals, rather than management when an incident happens. The final part of the preferred alternative that I feel will not ensure the long-term success of wolves in Montana is the provision that will allow wolves to be hunted when they reach sustainable levels. With all of the work and money that has gone into reintroduction wolves and making sure they are successful, this seems like a giant step backwards.

L0094: We realize that it is critical that we get the wolf delisted and feel you can do this under alternative #2 with this exception: you establish a zone for the wolf population. Give landowners more flexibility in central and eastern zones. We have enclosed a map with our zone on it. We feel that you can obtain your goal of actively managing wolves west of the line we have drawn on the map. Wolves should not be allowed to establish themselves east of this line. A much more stringent management plan should be in place for breeding pairs that migrate.

L0133: I am saddened by the proposed alternative. I honestly believe the document to be flawed, with the preferred alternative counter to Montana's game management objectives. Predation on big game populations is the greatest concern I have on the liberal approach to wolf management. The preferred alternative is costly, liberal in favor of the wolf, requires excessive government intervention and will have high negative impact on game resources in the state. My hope is that FWP will revisit the plan and write it in favor of protection of the wonderful game sources we currently have in Montana.

L0151: It is clear to me that FWP has thoughtfully attempted to balance the contentious issues surrounding support for a viable population of wolves, conflicts with livestock, human safety, and long term funding for wolf management. I am impressed with the comprehensive nature of the preferred alternative. In particular, the long-range objective of building public support so as to preclude the need for either artificially capping wolf numbers or define their distribution throughout the state is greatly appreciated. Willingness to allow wolves to strike their equilibrium with the system reflects the progressive nature of this alternative. Whether 15, 20, or 100 breeding pairs are used as the trigger point for toggling management actions, that trigger will only be as good as the FWP commitment to advocate on behalf of the species. Given the national interest surrounding gray wolves, I believe it is

entirely appropriate for the federal government to continue to provide financial support for Montana's wolf program after delisting. This support should continue for as long as it is needed to properly manage wolves in the state.

L0162: Alternative #2. It seems to best address the concerns of those both for and against the wolves in the wild. I'm very much impressed with the thought, research and dedication that have been applied to all of the alternatives. I would like to see specific penalties for those who would randomly destroy wolves. Also a plan for public education regarding wolves would be wonderful. Ranchers need to know alternative ways to protect their stock (besides use of firearms). Outfitters and hikers need to know how to best protect themselves in the event of wolf/human confrontation and how best to avoid conflicts with wolves.

L0176: My preference is plan #3, second choice plan #2. Compensation programs, however they are funded, should not become a permanent entitlement or worse, a way of buying off livestock producers and assuaging the conscience of "pro-wolf" advocates. It inappropriately sets wolves in a "special" category from other predators and other losses due to wildlife. It perpetuates the cartoon characterization of wolves by "excusing" their natural behavior with monetary compensation for the behavior. It bribes and demeans ranchers. The presence of wolves on the landscape reduces, like many other factors (weather, beef prices) the degree of control a rancher can exert over his livelihood. Incorporate compensation in the management plan ONLY under a sunset clause where it is understood that the compensation will either end on a set date OR continue only if the program is funded adequately through a bi-partisan sources (not JUST the wolf huggers). Any compensation program should seek to draw funds from the most diverse possible sources, including the meat and agriculture industry. If there is strict sunset provision (say 5 years and then compensation ends) it puts ranchers on notice that they have a reasonable time to make adjustments to the new reality of wolves on the landscape and it financially bridges that adjustment time. The compensation fund should also financially support education and innovation in regards to new approaches to managing livestock in an environment that includes wolves. Incentives for those ranchers willing to struggle with the adjustments necessary should be more important than paying off ranchers for affects of predation. Compensation should only apply to predation losses suffered on private property. This sends an appropriate message of support for the sanctity of private property and at the same time, signals that those who use public land accept certain caveats along with that usage. Only hunting, not trapping, should be allowed as a proactive management tool for culling wolves. Trapping is not only very difficult to defend in terms of the perceived brutality but it does little to condition wolves in ways that benefit wolves and humans. Wolf hunts should be conducted under strict regulations based on best science and in such a way as to do the least damage to pack social structure. Wolf hunts should only be guided commercial hunts, conducted with an outfitter who has been trained and certified by FWP. FWP would designate those animals available within pack structure that may be taken and outfitters would be certified and trained to select those animals for their hunter clients.

L0183: Urge the following improvements in the preferred alternative: increase to 20 the breeding packs. This would provide an extra safety margin between endangered versus liberally controlled and hunted, which is especially important since Montana harbors all the of the northwestern Montana recovery area population plus part of the Greater Yellowstone population and perhaps even one of more wolf packs associated with the central Idaho population – each of which must be managed in excess of ten breeding pairs to ensure long term wolf viability: until minimum wolf recovery goals are at least doubled and 20 breeding pairs are achieved in Montana, private citizens should not be allowed to kill a wolf unless it poses an immediate threat to human life or livestock. We oppose the issuance of kill permits that do not specifically target offending wolves only. Similarly we oppose hunting and trapping of a wolf population below at least 20 breeding pairs that is not selective against specific depredating wolves.

L0184: I agree that the preferred alternative with the adaptive management concept is an appropriate management direction for Montana. It is appropriate to recognize the tribes' authority on the seven reservations in Montana but it also raises a question about the adaptive management concept. Since the tribes have wolf conservation and management responsibilities on the reservations, does FWP intend to count wolf packs that occur on reservations when tallying numbers that signal changes in adaptive management strategies? If wolves are no longer protected by federal regulations a tribe could conceivably adopt any management strategy it chooses on its reservation. Tribes may choose a management strategy far less conservative than that indicated by the state's adaptive management process. It may be necessary to negotiate formal agreements with Indian tribes to coordinate monitoring, management and regulated harvest of wolves to ensure the effectiveness of a stateside management strategy.

L0206: Alternative #2 will not only insure the future of wolves in Montana, but also protect user groups with interest that may conflict with wolves, from undue harm. Budget for managing wolves is unrealistically high. We would like to know what FWP plans to do if money cannot be obtained from private or federal sources. The inadvisability of private hybrid and wolf ownership through regulatory means if problems involving these animals running loose continue. Uncomfortable with compensating livestock owners for depredations. They are not compensated for deaths caused by other predators. Should be linked to owners who employ proper husbandry practices.

L0254: Alternative 2 is fundamentally flawed for the following reasons. It fails to make clear what protections would be afforded to wolves under state classification as a "species in need of management" and how these protections differ from those provided under ESA.

L0341: Alternative #2. Needs provision in the plan to address wolf control for those counties that do not use Wildlife Services.

L0344: We support alternative #2 because it gives the state control, provides compensation, allows for hunting, trapping and gives landowners flexibility. Also it is very important that wolf numbers and management takes into account moose, elk, deer and antelope numbers. We feel alternative #5 should be pursued in the interim. Changes we should like to see are compensation for all pets killed by wolves whether it is a horse, dog, cat etc. But particularly for working stock dogs. Should be funded from general fund, as well as other public and private sources.

L0345: strongly urge and request that a program of compensation for the public loss of a public resource, wildlife be developed to match the compensation program for private livestock losses. This could be increased access, improved habitat and more FWP law enforcement and field biologist staff.

L0100: Alternative, leaning towards alternative #3. Because of the 20 pack # would allow landowners/ranchers more flexibility in dealing with wolves versus compensation, which doesn't seem like a sustainable solution. I also like the possibilities of hunting, any way the public becomes more a part of the process, the more successful the wolf program will be.

L0106: #2 – it is “balanced” with enough flexibility to work. Most important not to get to the point that wolves would have to be relisted. Cost of the program – it should be 90% federal money and 10% state and private. I am concerned about the protection of livestock and dogs (all dogs). For instance hunting hounds. All people should have the right to protect their animals, no matter where they are.

L0142. The preferred, as described is positive. The bigger question in my mind continues to be “is there a place in Montana in today’s society for introduced wolves?” From my perspective with all the impacts of this animal considered, I say no.

L0248: Alternative #2 seems to be the most likely of the acceptable alternative o remove wolves from the endangered species list so would be the alternative that MFBF supports.

E54. I can live with alternative #2, the choice of FWP. However, it will be criminal if one cent of FWP revenue obtained from hunters is used to manage wolves. The people of the whole US are the ones who decided to import wolves at a high cost to those same taxpayers. These same people should foot the bill. The alternative should clearly state that the federal government would pay for all costs.

L0331: Alternative 2 includes some favorable components such as enhanced ecological research, interagency and tribal coordination and monitoring. However we oppose the liberalized lethal control and hunting of wolves as identified and described in this alternative. In particular we believe proactive removal of potential problem wolves places the wolf population in jeopardy by killing wolves before there is any evidence of depredation or any attempts to prevent depredations. It is our belief and experience that working with a stable wolf pack can be more predictable and thus management to reduce or prevent livestock attacks can be more effective. If established wolf packs are eliminated, new wolves will colonize the same habitat and the problems may continue or even increase. By working with livestock owners and wolf experts, we believe non-lethal proactive methods in many circumstances can prove for more effective than lethal control. Under this component of alternative 2, however, the rush to implement lethal control of potential problem wolves may compound the problem. If these circumstances were to be adopted as standard management of wolf conflicts, Defenders would strongly consider withdrawing our financial support and resources for compensating livestock owners. Unfortunately alternative2 (and alternative 3) are also too lenient in allowing the lethal take of wolves simply for threatening to kill livestock or pets. It is an especially troubling provision when applied to wolf management on public lands.

Alternative 3, Additional Wolf

Summary of Comments: This alternative is similar to the Updated Council Alternative (2) except the breeding pair trigger increases to 20, and FWP would not create a compensation program. Some comments support the higher number of breeding pairs while other comments oppose the higher number. Closely related comments support implementation of Alternative 2, but with an increased number of breeding pairs. Some comments suggest modifying it to include a compensation program similar to Alternative 2.

Response: FWP prepared this alternative in response to public comments calling for greater numbers of wolves in Montana and that FWP should not create a compensation program. Even though FWP did not select this alternative as its preferred, FWP is aware of the interest for a larger wolf population in Montana and that management be conservative. FWP also recognizes that it would have even greater management flexibility if the wolf population were larger. But FWP did not select this alternative as it’s preferred in part because liberal tools would not be available until the higher number of breeding pairs identified in this alternative (20) were documented. FWP desires to have the greatest degree of management flexibility in selecting tools as soon as possible upon assuming management authority. Even under the preferred alternative, the wolf population will probably still increase despite the lower number of breeding pairs identified as the signal to change from conservative to liberal tools or vice versa. The rate of population growth, however, is projected to be slower given a benchmark of 15 breeding pairs vs. 20. In fact, the number of wolves in Montana in 2015 predicted by the preferred alternative is only slightly lower than predicted under this alternative, if assumptions are valid and the population performs as predicted. The 15 breeding pairs outlined in the preferred alternative is not intended to function as a cap on the Montana wolf population. Rather it serves as a signal to change management strategies in response to the wolf population status. See the Wolf Numbers comment summary and FWP’s response below.

One comment states that if distributional criteria are not part of the plan, that the number of breeding pairs should be increased as a surrogate to ensure adequate distribution of wolves across the state. The preferred alternative does not make any a priori assumptions about habitat suitability nor requiring a specific distribution. In part, this is because the gray wolf is a habitat generalist and its ecological requirements can be met across a wide variety of habitats and suites of prey. Human social tolerance varies across space and time at widely varying scales and is also difficult to predict at the scale of a wolf pack territory or even a broader landscape. The management approach would provide for long term population persistence and connectivity by maintaining adequate numbers of wolves and provide legal protections against indiscriminant killing. FWP believes a benchmark of 15 breeding pairs prior to using more liberal management tools will maintain adequate wolf numbers and that wolves will find their place on the landscape by finding suitable habitats. As noted above, the wolf population is still predicted to increase in size under the 15 breeding pair benchmark. If the population is not maintaining itself, FWP can take corrective action.

In addition, FWP is aware of the need to balance social acceptance for wolves with the need to address the economic losses that wolves sometimes cause. One way to address those losses is through reimbursement for confirmed and probable damages caused by wolves as recommended by the Wolf Advisory Council. The council discussed the concept of compensation at great length and concluded that it is an important part of the overall program. FWP agrees. The reader is referred to later sections of this appendix for FWP's responses to comments on specific issues as they relate to this alternative.

FWP is aware that the phrase "threatening to kill" is vague. The Wolf Advisory Council discussed this issue on many occasions and had difficulty defining what constituted "threatening" wolf behavior towards livestock with any degree of consistency from one scenario to another. FWP agrees. In Montana statute, "threatening to kill" is the same standard that applies to black bears and mountain lions in the context of defending livestock or property. Citizens do not appear to have interpreted that standard too liberally for black bears or mountain lions. Black bear populations appear to have at least maintained themselves and mountain lion populations have increased in both number and distribution with suitable prey availability. Whether or not wolf populations would be adversely affected under this standard remains to be seen. However, given the higher reproductive potential and dispersal capability of wolves, FWP is confident that corrective measures taken by FWP and the FWP Commission could mitigate or reverse any adverse effects if too many wolves are killed under the "threatening to kill" clause. FWP always has the ability to make more conservative decisions through the adaptive management framework in other aspects of the program if the wolf population approaches the relisting threshold.

Many comments support the workshop idea incorporated into this alternative. Whereas the original Wolf Management Advisory Council was appointed by a former Montana governor and this group alone made recommendations to FWP, their meetings were open to the public as per Montana's "open meeting" law. Members of the public in attendance were provided an opportunity to speak or submit written comments. While the preferred alternative calls for a standing advisory council, members of the public will still be able to attend and provide input. FWP also expects to have a regular presence at various stakeholder meetings to exchange information and foster working relationships with all interested parties. In addition, FWP will be available to attend meetings and workshops at the local level, whether county commission, local grazing district, rod and gun club, or conservation organization. FWP is certainly not opposed to the annual workshop concept described in the other alternatives, but is not committed to establishing that as the primary means to collaborate with stakeholders at this time. FWP could still hold a workshop even with the establishment of a standing advisory council.

Representative Comments:

W60: Concerned that alternative #3 and #4 don't have a compensation program. Compensation by others can't be predicted, how much effort and cost?

W104: Prefer alternative #3. Setting 20 breeding pairs is going to allow us to keep them off the list (more flexible).

W186: I support alternative #3 because larger number of breeding pairs provides for more flexibility, also protects against stochastic events. Less likely to fall to where more management is needed. Main concern with #3 is no compensation. It seems compensation was left out to sway the public.

W199: Prefer #3. I like the 20 breeding pair requirement. I think compensation for livestock loss should be the same as in alternative #2.

W996: I like #2 – I don't like the 20 pairs. I think 20 is pushing it.

W1193: Prefer Alternative #3, due to its more conservative approach relative to management triggers and it's more wolf friendly.

W1265: Alternative #3 is better option but needs compensation in it or #2 with 20 breeding pairs.

W1354: Alternative #2 is most practical. Alternative #3 iffy because too many more wolves. Public won't tolerate. Like flexibility in #2 and #3. Keep options. Need more fed money to pay. Wolves are a natural resource. Don't want state to start paying what feds have been paying. Hunters and anglers can't afford to pay.

W1432: Prefer #3 if compensation is included also.

W33: Alternative 3 – additional wolves – too costly, too many wolves.

L0125: Our first preference is Alternative 1. If management must be turned over to the state, then Alternative #3 which calls for additional wolves would be our next choice. We believe that the presence of wolves in our state enhances the quality of life here and is a vital part of what makes this a wonderful place to live.

L0229: We support alternative #3 because it sets the number of breeding pairs at 20 before changing management strategies from conservative to liberal, provides full legal protection for wolves and sets clear and specific rules for when citizens can kill wolves that are threatening livestock.

L0239: The state plan relies almost entirely on a population objective based on number of breeding pairs and includes, for example, no specific requirements for geographic distribution of these pairs. We believe that it is important that wolves be allowed to thrive in many areas of Montana and, if specific geographic distribution criteria are not part of the plan, that a larger number of breeding pairs may be an adequate surrogate to assure an adequate distribution of wolves across the state. The plan should not allow private citizens to kill wolf unless it poses an immediate threat to human life, livestock, or other property. Stewardship methods that reduce conflicts should be implemented before lethal control measures. Control measures should be selective against offending wolves only. We agree that an adequate compensation program for livestock losses to wolf predation is a key element in establishing social tolerance for wolves and other predators than can adversely affect livestock producers. The current sidesteps the details of how to accomplish this program and establishes only a process to this end. We believe that ultimately a state-funded compensation program, similar to Wyoming's, will be the most workable solution. We believe this should be funded from the general fund and not from hunter fees.

L0247: I am comfortable with the concept of the state taking over wolf management, AS LONG AS funding issues have been thoroughly addressed. This still needs federal dollars, because it is a federal priority. I like alternative #3 the best.

L0277: Alternative #3. This allows for more breeding pairs yet strong landowner flexibility in dealing with problem wolves. I want the State of Montana to participate to some degree in the compensation program. I am an avid hunter and outdoors person and strongly support the wolves' place in Montana.

L0327: ... supports an amended alternative 3. We would like to see some specific language in alternative 3 that commits the state to strong effort to protect key wolf habitat and linkage areas.

L0076: Alternative or 3 because 15 packs is too few for the millions of acres in MT. No scientific justification (population viability analysis or other model) for 15 pack minimum.

E011: I prefer alternative 3 simply because the breeding pair benchmark is higher. I think that a benchmark of 20 as opposed to 15 would put Montana wolves at a safer distance from the prospect being classified as endangered again. I believe that a compensation program is necessary to keep everyone happy. I also think that under all the alternatives that there should be incentives for citizens who are working to reduce or avoid conflicts between their livestock and wolves. Since wolves are here to stay it is important for livestock owners to demonstrate responsible animal husbandry practices such as removing livestock carcasses treating and removing injured or diseased animals and avoiding active wolf den sites. I believe that the State of Montana should continue to have a wolf management advisory committee to continue to identify, discuss, and discern management goals to aid in resolving conflicts and to educate the public.

E039: Alternative #3. I strongly believe that the higher the number of minimal breeding pairs (20 in #3) will make management easier for Montana. Higher numbers will make management easier because removal of problem causing wolves will have a smaller impact on the overall status of the wolf population. This will make control much easier for ranchers and if an entire pack must be removed in order to protect ranchers and livestock there will be more breeding pairs to replace the individuals that must be removed. Over long periods of time, this will lead to healthier populations and ensure wolves keep a place.

L0331: Unfortunately Alternatives 2 and 3 are also too lenient in allowing the lethal take of wolves simply for threatening to kill livestock or pets. It is an especially troubling provision when applied to wolf management on public lands. This standard is far too vague and would allow for varying and liberal interpretation essentially permitting any livestock or pet owner to kill wolves simply for being present but without requiring evidence of depredation intent. The final plan should allow for the use of only nonlethal deterrents in the case of wolves threatening livestock and pets. It should not permit lethal control based on individual interpretation of what constitutes threatening conduct by wolves.

Defenders supports a modified Alternative 3 with the addition of a livestock and livestock guarding dog compensation program and a proactive nonlethal depredation management program to assist livestock owners in co-existing with wolves and other native carnivores. Though we understand the concerns stated regarding challenges and limitations of compensation programs, many of those identified can be adequately addressed and the social benefit of such a program outweighs the limitations. We would work with the state of Montana and entities to share funding, new ideas, and management sources for these programs. Defenders believes it would be inappropriate to create a sport-hunting season on a newly delisted species. This component should be eliminated from Alternative 3 and replaced with provisions for nonlethal harassment. Citizens should not be allowed to kill wolves except in situations of protecting human safety which are extremely rare. We favor creation of the proposed annual workshop and interagency coordination meeting.

Both alternatives 2 and 3 offer fundamental strengths that we support and appreciate. These include: No artificial cap or limits on maximum wolf numbers in Montana. No artificial boundaries that exclude wolves from suitable habitat in Montana. No immediate hunting of wolves following delisting.

Alternative 4, Minimum Wolf

Summary of Comments: Through aggressive management, this alternative “caps” wolf numbers and “zones” wolf distribution to prevent wolf colonization east of the Rocky Mountain Front. Some comments support this approach. Most input supporting a zone originated in eastern Montana and is discussed under Alternative #2 above and under Wolf Distribution below. Other comments oppose the low numbers, restricted distribution and aggressive philosophy. Other comments opposing the zone concept state that wolves should not be confined just to western Montana -- all of Montana should share the responsibility so as not to concentrate all the impacts in the western part. Many comment supporting the 100% federal funding component also note concerns about “strings” that come with funding from outside sources. Some

comments suggest modifying this alternative to increase the number of breeding pairs to 15, yet keep the zone. Other comments want FWP to add a compensation program.

Response: FWP did not select this alternative because it would not allow FWP to manage wolves within an adaptive framework. FWP would not be able to meet the differing conservation and management expectations and interests that occur across the spectrum of social tolerance for wolf restoration. FWP management flexibility could be constrained by the low wolf numbers in that each wolf becomes important to the overall population when total numbers are low. Some management decisions to resolve conflicts may not be satisfactory or accepted in light of the need to maintain enough breeding pairs to prevent relisting. FWP also points out that the philosophy of this alternative would be inconsistent with how FWP approaches wildlife conservation and management for other species. FWP does not administratively declare an upper limit or maximum number of individuals of any wildlife species in the state in the sense of a “cap.” Instead, FWP identifies population objectives and management frameworks that are based on landowner tolerance, habitat conditions, social factors, and biological considerations. Wildlife populations are then managed according to the objectives and current population status, using an array of management tools. This alternative is also inconsistent with the overall recommendations of the Wolf Advisory Council. The reader is referred to later sections of this appendix for FWP’s responses to comments on specific issues as they relate to this alternative.

Some comments recommend changes to Alternative 4 that would incorporate the controlling acts of the Montana Legislature and make FWP’s management plan comply with state laws. FWP does not believe that the preferred alternative conflicts with these new actions by the 2003 Montana Legislature or any other state laws or administrative rules. On the contrary, the direction established by the preferred alternative is the most consistent of all the alternatives. In it, FWP will meet its legal requirements to maintain a secure, recovered population, comply with state laws and Commission policy, integrate the wolf within Montana’s wildlife heritage, while at the same time lessening potential negative impacts to those most directly affected by wolf presence.

Some comments suggest that FWP adopt a more stringent management protocol for breeding pairs that migrate. Additionally, some comments support FWP enforcing an administrative “zone” and translocating any wolves in eastern Montana back to western Montana. FWP clarifies that the state’s wolf conservation and management plan will apply to wolves wherever they are found in Montana, regardless of breeding status or location. While the preferred alternative does include translocation as a management tool for application in some circumstances, FWP does not plan to translocate wolves from eastern Montana to western Montana to enforce an administrative “zone.” See the Wolf Conservation and Management section below. FWP anticipates that the circumstances in which it would select translocation would be rare.

Representative Comments:

W88: 10 bare minimum is my favorite. It’s a problem getting accurate count. Don’t want any more wolves than we have to; may need more than 10

W119: Like alternative #4, but because of worries that the wolves may be relisted if below 10 pairs, would have to support alternative #2. Federally funding compensation program; regulated wolf harvest

W216: alternative 4 preferred, but zero tolerance

W287: Alternative 4, move from 10 pairs to 13 or 14.

W348: I like #4, too. Would be distributed in western Montana, not eastern.

W462: lean towards #4, but with compensation

W464: lean towards #4 because it is fully implemented with federal dollars. Why should we be paying for them?

W542: I support Alternative 2. Draft is excellent. Allows the use of management tools in the most advantageous way. Alternative 4 is most expensive so not good. Would compromise in the direction of Alternative 3, not #4.

W655: I’m not for any alternatives 100%; #4 is best choice if any.

W778: Alternative 4 – all I want is the fewest wolves possible without it being on the federal endangered list.

W1328: Must have alternative for everyone. Agriculture community could live with alternative 2. But add in zones as in alternative #4. Manage migrating wolves more aggressively. Must delist first.

W1428: Prefer #4; like the idea of protecting private property. Concerned that wolf could be relisted under this option. Therefore, would prefer #2.

W112: Alternative #4 – less numbers, less problems, no state funds

W99: Alternative #4: Ten breeding pairs is an adequate number of wolves to assure future of wolf survival in Montana without severely damaging big game populations and decreasing hunting opportunities in the state. Guarantee wolf harvest with hunting and trapping

W122: Number 4 – the less wolves the better. Federal funding. Wolves should be distributed east and west and not just in western Montana

L0023: I am adamantly opposed to both options #1 and #4.

L0047: When crafting a wolf management plan for Montana, FWP must recognize that it is required to honor the political will of the people of Montana. MSSA wishes to remind FWP that it is hunters who pay the bills for wildlife management in Montana, and therefore, the collective voice of hunters must be given a commanding role in FWP management decisions that may have a profound effect on our traditions, culture and opportunities. MSSA rejects all proposed alternatives for wolf management contained in the draft EIS and recommends adoption of a new alternative that would most closely resemble alternative 4. In addition to the management directives contained in alternative 4, the new alternative is required by controlling acts of the legislature as follows: HB262, HJ32, HB306, SB209. The new alternative eventually adopted by FWP must be consistent with these acts of the Legislature. The new alternative prepared by FWP will necessarily be circumscribed by these acts, and not driven by public opinion polls, and not even by any perceived consensus of public comment concerning the draft EIS.

L0094: We realize that it is critical that we get the wolf delisted and feel you can do this under alternative #2 with this exception: you establish a zone for the wolf population. Give landowners more flexibility in central and eastern zones. We have enclosed a map with our zone on it. We feel that you can obtain your goal of actively managing wolves west of the line we have drawn on the map. Wolves should not be allowed to establish themselves east of this line. A much more stringent management plan should be in place for breeding pairs that migrate. We would like to see the wording in Alternative 4, page 91, added to Alternative 2 – “wolf distribution would be artificially zoned so that wolves would be trapped and relocated to western Montana or removed from the population if suitable release sites could not be found...”

L0166: I would favor alternative #4 simply because I see no cap on the number of breeding pairs in Alternative 2. Should be entirely funded by the federal government. The state should not implement a plan which relies on revenue from the harvesting of wolves. In my mind this is a direct conflict with the management of deer and elk.

L191: I remain concerned that alternative 2 is unnecessarily liberal and encourage reconsideration of alternative 4. With a three state recovery area, Montana's contribution to the recovery effort need not exceed 10 breeding pairs or w/3 of the area goal.

L0248: Alternative 4, on its face seems the best solution for wolf management from the livestock producer aspect. Our apprehension is that the cost of this management plan could far exceed the cost of Alternative #2. This alternative proposes that management be turned over to the state and yet the federal government would be expected to entirely fund the program. In addition, wolf numbers would be managed at the knife edge of the requirements of delisting so unanticipated occurrences such as disease, drought, or hard winters could tip them back into the endangered listing. If the USFWS does accept such a plan, we are stuck with management continuing under ESA and/or substantial additional cost to the state.

L0253: In accordance with our belief that uncontrolled wolf populations will reduce big game hunting opportunities and our support for hunting as a multiple use on public lands, we vigorously oppose all the alternatives, except alternative 4.

L0284: Alternative four looks good on the surface, but with the state having to pick up the funding for control and for payment of damages, that is not an alternative.

L0285: It is tempting to say that MOGA's first choice is alternative 4, however there are significant concerns associated with alternative 4. It appears to be driven by private landowner's low tolerance for wolves, tolerance that is certainly understandable. The problem arises when one considers the results of zoning and forcing wolves into public land, mostly in western Montana, rather than a more equitable, wider pattern of distribution. Alternative 4 may provide for trapping and hunting, but probably only in the beginning when the wolf populations need to be downsized quickly. Once the populations reach objective, trapping and hunting might become an occasional management tool, with strict quotas, rather than an ongoing one. Managing for a minimum of ten breeding pairs would be extremely expensive, as FWP would be forced to monitor wolves much more closely than with alternative 2. While wolf predation on big game populations would be minimized under alternative 4, the risk that Montana could fall below the population objective and return to a listed status is too important to ignore. After careful consideration, MOGA wishes to go on record as supporting with some modifications. We believe 15 pairs is sufficient and practical.

L0286: In alternative 4, artificial zones are established to prevent colonization of eastern Montana (because of possible increased livestock conflicts?). Without a map of the regions to know where the boundaries are, does this still maintain an adequate corridor between Montana, Canada and Wyoming populations?

L0287: Distribution of wolves needs to take on more of the properties of alternative 4. Wolves should be encouraged to stay in the western portion of the Montana and the population that expands into eastern Montana be more aggressively managed. Alternative 4 also states that more management and control will be carried out by landowners – this language should be included into #2, but in conjunction with FWP. Compensation needs to be included in the adopted wolf management plan. FWP is best positioned to act as the coordinator for the development of a compensation plan. It is stated in #2 that no FWP or Montana general fund money will be used to fund a compensation program, but it is essential that your agency take the lead in setting up the program and secure an adequate source of funding to cover the anticipated losses that will occur. FWP must be prepared to accept the liability if these losses are too great and force an operation out of business. The Info Ed / Public Outreach segment of #2 would be much more beneficial if the language “increased interaction with landowners to notify when wolves are in the area” was included as stated in alternative 4. MSGA still feels that the additional 4.3 FTE and 2.5 FTE enforcement staff are not warranted. MSGA feels it is important to redistribute additional funds toward preventative efforts and depredation. By reducing the hiring for suggested positions, more funding can be allocated to reducing wolf/livestock conflicts.

L0030: Support alternative 4. The estimates in other plans on livestock losses and wildlife reductions are too low. Funding from Montana should be less than 10% or the same % as the population of Montana is of the US. I would increase the breeding pairs to someplace between 15 and 20. Confine the wolves to National parks and wilderness areas as much as possible.

L0096: Alternative 4 – lowest number of wolves. ... Put wolves evenly throughout the state as there is as many deer in eastern Montana as western ...

E6: the minimum wolf alternative is the best of the choices next to eliminating them entirely

Alternative 5, Contingency

Summary of Comments: In this alternative, FWP would begin managing wolves through an agreement with USFWS prior to USFWS completing the delisting process and/or resolving litigation. FWP developed and analyzed the impacts of this alternative because it received many comments expressing concerns about delays. Many comments on this alternative support some level of FWP involvement prior to complete delisting, although they were relatively few in number compared to the other alternatives. Many also note a concern that the scenario described by this alternative could become the *defacto*, long-term outcome and that wolves may never get delisted. Many of the comments mentioning Alternative 2 also mention Alternative 5. The funding split is favored, but some comments express concern that federal funding may not be reliable over the long term.

A few comments specifically oppose FWP involvement under this alternative because of a lack of trust in state elected, appointed, or agency officials. These comments overlap with comments mentioning Alternative 1 (No Action). Still other comments oppose this alternative because of concerns that it would decrease the incentive for USFWS to achieve full delisting and transfer authority to Montana or that FWP would still be constrained by federal rules.

Some comments suggest modifying this alternative similar to Alternative 2 (Updated Council).

Response: FWP did not select this alternative as its preferred because FWP would like to assume management authority for a completely delisted wolf population and proceed with a program guided entirely by state laws, administrative rules, and policies. The potential for confusion or uncertainty about jurisdiction and authority could, in the long run, be a disservice to the wildlife resources of Montana (including wolves) as well as the public. However, FWP is aware and sensitive to the concerns over the potential for delays to adversely affect Montana's interests. It does represent an interim step in which FWP could carry out day to day wolf management duties, gaining more experience and addressing a desire for increased agency responsiveness beyond current satisfaction with federal authorities. At this time, FWP will still identify the Updated Council Alternative as its preferred option, but may revisit this alternative at some point in the future if delisting is not initiated and completed in a timely fashion.

Representative Comments:

W84: Implement alternative 5 in the interim, then go to alternative #2 after delisting

W107: support alternative 3, second choice alternative is 5

W191: If we go with contingency plan, would like to see 20 pairs instead of 15.

W540: I like alternatives 2 and 5. What I like about 5 is FWP would take some control if delisting takes time. I almost completely agree with #2.

W587: If approval is needed, I support alternative 5 because it gives some control and only costs the state 10%.

W990: Go for #2 – why mess around with #5

W992: if there is an interim period, alternative 5 would be good – it gives you some time to learn until delisting

W993: I don't want #5 to be our long term objective, but we would like to see it until we can get #2 in action

W1235: Don't want federal government involved. No trust. I don't like alternatives that have federal involvement.

W1151: the problem with the contingency plan is that it is under federal management

W1310: populations will grow rapidly – alternative 5

W37: alternative is a good mix of options and still keep wolves from being relisted. Need to have an easy method for compensation. I am afraid that we will be at Contingency Alternative – set limit at 10 if this happens.

W61: Contingency or updated council. Contingency really hits the one concern I have.

L203: I would advise caution in depending on long-term availability of federal financing support. Some mechanism be set up to assure continuous funding from FWS with protection against the effects of inflation. If federal funding does disappear, it behooves FWP to have the prerogative to shift the management back to FWS – somewhat like the situation provided for under alternative 5; too often the fact that federal funds are also derived from taxes tends to be overlooked.

L0248: MFBF and other livestock organizations worked very hard and in good faith to develop a plan that they feel addresses their concerns and yet gives pro-wolf advocates the comfort that the species will continue to exist on the landscape. All of this work could be negated and the entire process placed in jeopardy if lawsuits are allowed to derail or significantly slow the implementation of wolf management. It is vital that Alternative #5 be in place as a fall back plan in the event the above mentioned lawsuits occur and delisting is held up for an indefinite period of time in the courts.

L0284: Alternative #5 must also be considered, seeing that there already are threats by environmental non-hunting groups to stop any delisting of the wolf (MWGA).

L0285: Alternative 5 should be considered a “default position” and not a first choice. Alternative 5 appears to mandate management by federal rules rather than Montana law – and provides no federal funding (MOGA).

L0287: All of the time and effort put forth to develop a management plan by the State of Montana may be put on hold while the court system sorts through the lawsuits and appeals and for this reason, it is important to include #5. MSGA feels it is reasonable to have a “fall back” plan to allow for the transition to a full delisting of wolves. MSGA is concerned that if FWP is required to adopt this alternative, your department and the FWS joint management will remain will into the future. It would be detrimental to our state if your department got caught into a management effort similar to grizzly bears. MSGA has contended all along that FWP should have sole responsibility for management of wolves.

L0330: We expect to see litigation used a means to prolong the delisting process. It’s vitally important that the department request some management responsibilities for the interim period that will allow them some control over expanding wolf populations.

L0343: Contingency is best option for me as a permanent approach – wolves remain on the federal list until more stable and larger population; like shared management under a cooperative agreement; federal livestock rules until FWP has a stable proven management program.

L0012: I believe the contingency plan should be the adopted plan. Why the big hurry to delist? I am afraid we will undo decades of work to reintroduce them in a few years and we’ll be back where we started. Why the hurry? So we can have open season on wolves? Also this way, the federal government pays the majority of the costs. Just make sure the state has major input and that ranchers do have flexibility to protect their herds

L0315: I strongly support alternative #1 and strongly oppose #4 and 5 Having noted my opposition to any state takeover of wolf management, I would also be opposed to any partial management under alternative 5 while the feds are in the litigation which is bound to occur

None of the Alternatives

Summary of Comments: Some comments do not support any of the alternatives. This is generally accompanied by a preference for a management approach outside the sideboards of the federal recovery criteria (e.g. classifying the gray wolf as predator, starting a bounty system, or “no wolf”). Some comments support the “Wyoming” approach of dual classification – big game in national parks/wilderness and predator outside. Other comments prefer that USFWS takes a more conservative approach to the existing federal program. A few comments offer a customized collection of management tools or approaches that recombine elements of the alternatives already included and analyzed.

Response: FWP could craft an entirely new alternative for inclusion in the Final EIS that would reflect these comments. However, FWP cannot consider any alternative that is outside the sideboards of the federal recovery program requirements to maintain a recovered population or one that is beyond the jurisdiction or ability of FWP to implement. The reader is referred to pages 8-11 of the Draft EIS for a discussion of issues identified but not addressed in the Draft EIS and why. Page 65 of the Draft EIS described three alternatives that FWP identified through issue scoping but did not consider further. Lastly, the reader is referred to later sections of this appendix for FWP’s responses to comments on specific issues.

Representative Comments:

W247: Should be 6 alternatives – 6 is no wolves at all.

W300: Wyoming proposal – extend hunting to all public ground. Let landowners on private property manage as he/she sees fit.

W738: There needs to be another alternative. There are a lot of variables. Maybe we should wait 5 years or so before creating a management plan when we have a better idea of what wolves need.

W953: alternative 6 – eradication

W835: Can't support any of these until funding sources are cleared up. Funding has to be clarified.

W48: Alternative #4. Please remove the BS from your draft. Many statements are not true. No wolves should be an option.

W55: None of the alternatives. The local people do not want wolves here. The federal government spent millions to get rid of them. If people want wolves, put them back in the city, not here. Eliminate them now!

W116: As a landowner, taxpayer, and one who raises cattle, I believe that if the people want to see wolves in the national parks, fine. I believe if they leave the parks and the wilderness areas, they should be considered a predator and have the same status as a coyote.

W0026: They are an important part of the ecosystem, and have a right to their place on the planet, as do all living things. Certainly farmers and ranchers have a right to protect their cows, sheep and other livestock. So my proposal is that wolves can only be killed when a farmer or ranger sees them attacking his livestock, or an attack is imminent. The farmer or rancher must then report the killing and sighting of the wolf in the vicinity of his livestock to the appropriate FWP agent. Only with these strict rules can we hope to save the wolf from those who wish to exterminate this beautiful animal.

L0027: None of Montana's FWP alternatives give the landowner the right to kill wolves on their property. This must be an option! It is unconscionable to expect the livestock owner to tolerate financial losses from a source over which they have no control. Compensation for losses after a long drawn out verification period, while losses are still occurring, further stresses an already depressed industry. Let those who desire wolves finance the protection of the other's property. When then is FWP accepting the danger wolves pose to the economic well being of the citizens and not protecting us from harm? The wolf is not a native species. Rather wolves are an invader species. Our existing species are those endangered by this new predator.

W0047: MSSA rejects all proposed alternatives for wolf management contained in the draft EIS and recommends adoption of a new alternative that would closely resemble #4 (see above under #4).

W0091: I am in favor of NONE of the alternatives offered in the draft EIS, as each of them is unsatisfactory in one way or another. We have here a proposed wolf program which we are being asked to agree to with just too many open-ended totally unmeasurable variables.

W0137: The only sound plan is to remove wolves from farm and range areas – they came first and wolves should be gone, gone, gone!!

W0140: The five alternative wolf plans proposed by FWS and FWP are all unacceptable. The wolf reintroduction program will go down in history as an abominable disgrace perpetuated upon the taxpayers of Montana, Wyoming, and Idaho by the USFWS. To go along with any of the 5 proposals would be going against all of the people who pay taxes, buy sporting equipment, and purchase hunting and fishing licenses.

W0160: Would like to see the state install the same type of regulations that would follow the great insight of the state of Wyoming so that landowners and concerned citizens could shoot at will all wolves that are seen on public or private land other than certain national parks and state wildernesses that are designated as safe havens. We really don't want to break any laws, so think about passing laws we can all accept, not just the environmentalists.

L0173: Wolves are an important part of a healthy ecosystem. Wolves are important to the economies of the Montana area. Wolves have received a "bum rap". They are not the huge predation problem they have been made out to be. Adopt a no wolf-killing plan.

L0174: Put a bounty on wolves like we used to have. If we aren't smart enough to control them, then they will become a threat to our lives as well as our livelihoods. Dinosaurs became extinct and I haven't missed them.

W0234: It was unanimously decided by the club to reject all 5 alternatives. We want the wolf to be declared an unmanaged predator with the same rules and regulations as those of other unmanaged predators such as coyotes.

L0313: Every wolf pack that has come in contact with domestic livestock has eventually had conflicts resulting in direct or indirect losses to those livestock. Since the perpetuation of Montana's wildlife depends on the habitats of Montanans private lands we feel the following criteria must be incorporated into the wolf management plan for Montana. Wolf numbers must be the absolute minimum to satisfy re-listing the wolf. Recognize the wolf is a predator and livestock producers must have the right to protect their livestock on private and public ranges, using preventive and reactive methods. Damage caused by wolves must cover confirmed and probable kills and also all indirect losses from wolf conflicts. Compensation is not acceptable and should not release those responsible for the accountability of reintroducing the wolf and the damages caused by their actions. Management of the wolves should be directed to maintaining the minimum number of packs to prevent re-listing and also establish a maximum number of packs Montana has to tolerate and provide wildlife and livestock as its prey base.

Summary of Public Comments on the Issues and FWP's Response

FWP received many comments that were similar or repetitive in that they raise the same issues. Because of the significant degree of overlap between comments on the alternatives and comments on the general issues, most of FWP's responses are presented under the issues section below instead of the alternatives section above. However, if FWP didn't

respond to a comment under the respective issue, the reader should look under the alternatives for additional information about FWP's response. FWP received a significant number of comments on the Draft EIS. Therefore, only a representative sample is included in this appendix. The project file contains a complete record of all comments received by FWP.

Wolf Conservation and Management Strategies, Wolf Numbers and Wolf Distribution

This group of public comments reveals many different philosophies, tools, and strategies for how wolves could be managed; comments also address how many wolves would be in the Montana population and where they would be distributed. FWP received comments that were diametrically opposed – both in philosophy and specific strategies. Each subgroup is addressed separately below.

Conservation and Management Strategies

Summary of Comments: Some comments address the wolf management philosophies and strategies of the specific alternatives, as discussed above. One comment suggests that the Draft EIS failed to identify what would be gained or lost by choosing one alternative over another. Some comments support the adaptive management framework in that it allows FWP to address local concerns and adjust management based on local conditions. These comments frequently say that managing wolves similar to mountain lions and black bears and other wildlife makes sense. Another group of comments say that it is not appropriate to manage wolves similar to mountain lions and black bears because wolf biology is very different from other large carnivores. Other comments oppose an adaptive management framework by stating that it is too complicated and cumbersome.

Some comments say that the breeding pair benchmark is too high of a standard, whereas others say that the “social group” definition is not stringent enough because reproduction would not be confirmed. Some comments supporting the proposed “social group” definition want FWP to use the more general definition from the outset. Still other comments applaud the change from “packs” in the original planning document to breeding pairs in the preferred alternative because it is more specific and required successful reproduction to count toward the benchmark. A few comments question whether FWP should count pairs located on Indian reservations towards the breeding pair benchmark even though FWP doesn't have authority to manage wildlife within reservation boundaries.

Some comments say that the liberal management tools are too liberal and heavy-handed, serving to keep the wolf population right around the adaptive trigger of 15 breeding pairs without allowing the population to expand because of continued selection of ever increasingly liberal tools. These comments also suggest that the benchmark would function as a *de facto* “cap” on the population. Some comments suggest that FWP not allow citizens to shoot or poison wolves and that FWP provide strict guidelines to citizens. Some comments go on to say that lethal control actions within the adaptive management framework should only target offending wolves. Some comments show concern about the proactive removal of “potential problem animals” and that accurate identification is difficult or that this management strategy could place the population in jeopardy. Some comments also suggest that proactive methods, harassment and scaring tactics will suffice to avoid conflicts and prevent escalation of conflicts.

Some say that the preferred alternative goes too far in accommodating humans over wolves and suggest that the program be grounded on wolf ecology and not human preferences. Related comments express concerns about excessive illegal mortality without stiff penalties. Additionally, comments say that the preferred alternative did not specifically identify penalties for illegal killings. One comment suggests that the draft EIS is deficient in that FWP did not analyze the implications of changes in human behavior that people will become increasingly intolerant of wolves once ESA protections are removed.

Some comments support the “species in need of management” designation while others want the gray wolf to be classified as a big game animal or furbearer immediately. Other comments suggest that wolves be legally classified as predators. A related set of comments either support or oppose regulated harvest of wolves through hunting and trapping activities by licensed individuals.

Response: The spectrum of alternatives presented in the Draft EIS was based on public comments obtained during the scoping phase. The Draft EIS discloses and displays the relative impacts of each of the alternatives in a summary table starting on page 148. The reader is referred to that table to consider the relative impacts of one alternative compared to another. The relative gains or losses or costs or benefits of one alternative over another is often in the eye of the beholder and determined by one's perceptions of whether they will benefit or be harmed by the outcomes. FWP is required by law to consider the impacts objectively. In selecting the alternative based on the work of the Montana Wolf Advisory Council, FWP is attempting to balance a diversity of public interests and desires about wolf conservation and management. The balance point is based on a delicate set of tradeoffs, the consensus of the advisory council, and public comments gathered through this EIS process. FWP envisions continuing the dialogue about wolf management at the local level through implementation at the regional office level and personnel stationed throughout Montana. FWP welcomes the public to continue to be involved and help FWP make decisions.

FWP believes that it is appropriate to manage gray wolves in Montana through an adaptive management framework because it allows FWP flexibility to implement a balanced program within a complex management environment that includes people, a diverse physical and ecological landscape, and wolves. FWP's experience with managing mountain lions and black bears has demonstrated that people are an important part of the management environment and that having the flexibility to respond differently in different circumstances has contributed to increasing human tolerance for the presence of large carnivores. While the preferred alternative seeks to integrate the gray wolf into all other FWP wildlife management programs and seeks to manage wolves consistent with how mountain lions and black bears are managed, FWP does acknowledge that there are important ecological differences between the three species. Reproductive rates, pack existence, and wolf behavior require that FWP take those differences into account when making management decisions. However, FWP seeks to manage large carnivores in similar philosophical ways and to implement the programs with as much consistency as possible while taking each species' unique ecology into account.

An adaptive management framework that establishes a benchmark provides a more objective framework within which to make decisions. The benchmark, when used in conjunction with population monitoring data that provide an insight into population status and trend, helps determine appropriate management tools. The adaptive management framework described under this alternative will guide management for all wolves in Montana, regardless of breeding status or whether or not a particular wolf is affiliated with a pack. Breeders, non-breeding, lone dispersing wolves and pack affiliated wolves will all be conserved and managed as a single Montana population within the larger northern Rockies population using the same conservation and management tools. Additionally, FWP seeks to manage wolves using a consistent set of management tools and principles, while at the same time allowing the flexibility to be responsive at the local level. FWP owns a small fraction of the potential habitat used by wolves in Montana. FWP will work with the respective landowners towards implementing the program with that balance of consistency and flexibility, whether the landowner is a private citizen, a state or federal agency, or a private company. FWP and the public must also be aware that landowners have discretion over their respective properties. See Table 22 in the Final EIS for additional detail on the spectrum of wolf conservation and management activities through the adaptive framework of the preferred alternative.

FWP is sensitive to the concerns that management decisions would be too heavy-handed and could potentially jeopardize the long-term viability of a recovered wolf population. FWP is also aware of the concern that the adaptive management benchmark could inadvertently become a "cap" on the wolf population. FWP reiterates that it has been very explicit in stating its commitment to integrating wolves into Montana's wildlife heritage and that wolf management will follow a similar path as the management of other species. FWP doesn't "cap" other wildlife populations. Wolf population size and distribution in Montana will ultimately be determined by the interplay between social tolerance and ecological needs, as it is for other wildlife. Finding that balance point in the case of the gray wolf will take some time. FWP will not intervene based on an arbitrary cap or zone, but will help fine tune numbers and distribution based on social tolerance and the ecological requirements of wolves and other wildlife. Implementation at the local level through Regional FWP personnel will help achieve this. The preferred alternative also calls for the creation of a standing wolf advisory council. FWP's response to public comments supporting the workshop concept is included under Administration/Delisting below.

Upon delisting, the gray wolf will be reclassified under state law from "endangered" to a species "in need of management" which maintains the legal mechanism to prevent intentional human-caused mortality outside the immediate defense of life/property. The preferred alternative states that the FWP Commission may reclassify the species as a big game animal or furbearer. FWP believes that the initial conservative designation is important during the earliest stages of implementation of a state program due to uncertain outcomes of the various management provisions. While FWP has

every confidence that the preferred alternative will maintain a secure population, conservatism is warranted at the outset. When it becomes clear that the management program is maintaining a secure, viable population, reclassification may follow. USFWS and FWP agree that regulated harvest through hunting and trapping are reasonable management tools to consider and implement, so long as the overall total mortality rates from both human and natural causes do not impair the biological sustainability of the population. The Montana Wolf Management Advisory Council and FWP recognize that licensed hunters and trappers are additional management tools which, when implemented with proper consideration and structure, can help fine tune wolf numbers and distribution. FWP would like to have as many management tools available as possible. The preferred alternative specifies that at least 15 breeding pairs are required to use liberal management tools, such as regulated harvest. FWP is aware that there are differing public opinions about the appropriateness of hunting and trapping in general or for specific problem animals and reiterates its assurance that all regulated harvest opportunities will be carefully managed and will not jeopardize the recovered population. FWP will bring the same degree of consideration for population security while implementing kill permit provisions for private landowners. FWP will use the monitoring program to assess wolf population status and population response to the implementation of the adaptive management tools, whether liberal or conservative. In that way, FWP will be able to make the necessary adjustments if numbers decrease. While telemetry is expensive, it will be an important monitoring tool. See Monitoring section below.

FWP also points out that the classification of the gray wolf, as a “predator” under Montana statute would not establish an acceptable regulatory mechanism on human-caused mortality. In addition, creating a dual legal status for wolves in Montana where they would be classified as a “predator” on private land and a “species in need of management” or “big game animal” on public land would also not be acceptable to USFWS for the Montana portion of the northern Rockies population. Nearly all wolf packs in Montana include some proportion of private land within pack territories. In addition, none of Montana’s wolf packs resides strictly in wilderness or national parks. FWP would not be able to maintain enough packs to satisfy its minimum legal requirements under a dual-classification scheme.

The preferred alternative confirms that FWP would seek state legislation to make the unlawful taking of a gray wolf a misdemeanor under MCA 87-1-102. FWP would also see legislation to include the gray wolf under the restitution sections of MCA 87-1-111. FWP confirms that the adoption of penalties and fines under Montana law, in addition to FWP Commission rules is consistent with the Council’s recommendation that law enforcement be a high priority, that illegal activity be discouraged, and that penalties be similar to unlawful activities for black bears and mountain lions. The FWP Commission will address penalties during a future rule-making effort for the “species in need of management” regulations and the Montana Legislature will address these in a future session.

Yes, FWP would count breeding pairs occurring on reservations if reliable information from tribal wildlife authorities were available. While FWP would not be monitoring those wolf packs within reservation boundaries, tribal wildlife authorities could. Tribal authorities will determine wolf management on reservations. If wolf packs persist on reservations, they will make a contribution to the tri-state population and provide dispersers to enhance connectivity. If packs do not persist, FWP will still ensure that an adequate number of packs do persist off reservations. The reader is referred to the preferred alternative in the Final EIS for additional discussion of how packs would be counted and the discussion about the definition of social groups vs. breeding pairs.

FWP is aware of the concerns about how human attitudes may influence behavior and the potential for political pressure to affect FWP decision-making. FWP and the Wolf Advisory Council recognize that human attitudes and willingness to tolerate the presence of wolves is an important foundation to maintaining a recovered population. FWP is also aware that attitudes towards wolves may change very slowly. FWP’s public outreach efforts and responsive implementation should help alleviate the fear and uncertainty in the public’s mind about coexisting with a restored wolf population – as both they and FWP gain more experience. Residents of northwest Montana appear to have adjusted to wolf presence slowly over the last 20 years as wolves have increased in number and distribution through recolonization and natural increases. Wolf presence in southwest Montana is a sudden phenomenon by comparison because the reintroduction effort led to a relatively rapid increase in wolf numbers and distribution.

Once the gray wolf is delisted, FWP does not know whether people’s behavior will become more or less tolerant of wolves. At the present time, no data support or refute the speculation that tolerance will diminish if the state were to assume management authority. Some public comments say that tolerance would actually increase once wolves were managed by Montana instead of federal officials. Other comments demonstrate low tolerance regardless of what agency is responsible and whether wolves fall under state or federal law. Many Montanans conclude that it would be in their own

best interest to maintain a viable, recovered wolf population in lieu of an emergency delisting. They are aware that excessive human-caused mortality would trigger delisting.

FWP considered the possibility that changes in human attitudes, behaviors, or actions could occur at any time and be precipitated, in part, by a variety of events or circumstances. FWP has also considered that malicious wolf killings could increase in the absence of federal ESA protection and stiff federal penalties. Through the adaptive management framework, FWP will be able to make adjustments. The wolf monitoring program will help FWP keep track of the wolf population and size/status of individual packs in much the same way as the federal monitoring program. In addition, through the FWP Commission, FWP can respond by decreasing regulated forms of human-caused mortality including agency control actions, increasing public outreach, and increasing presence in the field by biologists and law enforcement officers.

Several comments express concern about human safety. FWP believes that public safety is an important consideration because species such as the gray wolf, mountain lion, black or grizzly bear are capable of injuring or potentially killing a person. It is also possible for a rabies-infected wolf to transmit the disease to humans. Though wolves generally fear humans, there are cases where individual wolves lost their fear of people and caused injuries, but no human fatalities have been reported in North America. Under the preferred alternative, FWP intends to reduce the potential for wolf-human conflicts and minimize the risks of human injury due to any large-sized canid. While the risk of an aggressive encounter with a wild wolf is low, FWP believes that the risk goes up in the absence of proper management. FWP will use extensive outreach to inform the public, aggressively discourage habituation of wild wolves, and respond to conflicts where and when they occur. FWP added additional information in the Human Safety section of Chapter 2 specific to rabies. FWP also added additional information about wolf health and disease surveillance in the Wolf Management section of the preferred alternative. See the Hybrids section below.

FWP and WS will make concerted attempts to identify specific problem animals during any lethal control effort while resolving wolf-livestock conflicts. FWP will also bring the same approach to implementation of the special kill permit provisions for private landowners. FWP acknowledges the difficulty experienced by USFWS and USDA Wildlife Services in successfully identifying individual problem wolves involved in livestock depredations. Wolves are highly mobile and may be miles away by the time a depredation event becomes known. Wolves may or may not return to a carcass. FWP also acknowledges that certain lethal control methods may not successfully target individual problem wolves. Resolution of wolf-livestock conflicts is a complex challenge due to the wide variety of husbandry methods and circumstances in which livestock are raised (e.g. large public land grazing allotments in mountainous terrain, small private pasture near human dwellings, large private ranches with remote pastures away from human activity etc.). It is further complicated by the behavior patterns and high mobility of wolves. Each situation will need to be evaluated for its unique characteristics prior to selecting a course of action.

Many comments want FWP to secure adequate funding prior to finalizing a management plan. In the preferred alternative, FWP clearly states that supplemental funding is required to prior to assuming management responsibility so that all aspects of the program can be implemented. FWP is presently working with the Governor's Office, the states of Idaho and Wyoming, and the respective Congressional Delegations to secure adequate funding. The states are seeking funding to become more involved with the federal program leading up to delisting as well as to implement their respective programs after delisting. FWP can still finalize and adopt a conservation and management plan without having the funding, but choose not implement it until the funding is secured.

Representative Comments:

W2: Hunting is not realistic because they are difficult to hunt in the sense elk and deer are hunted.

W5: I am concerned about regulated wolves like other predators (bears, lions) due to reproductive differences.

W6: Managing them like bears and lions is going to be difficult also due to their behavior characteristics (hunting in packs/more offspring etc.)

W23: I like the idea of the state controlling problem wolves.

W26: What definition of "threatening" will there be?

W27: If the population is out of control, would the state look at or implement a sterilization program instead of a hunting program.

APPENDIX 5

- W46: Regulated wolf harvest as part of management. Alternative is shoot, shovel and shut-up.
- W49: Higher penalties for violations.
- W50: How do you keep 15 breeding pairs and still allow hunting by the public?
- W55: It's important to recognize that a wolf is a more aggressive predator than bears or lions.
- W66: The longer you do nothing, the more difficult it will be to balance the approach.
- W94: Adaptive, local management is important.
- W95: Go middle of the road to help manage problem areas.
- W102: Make the plan more of an ecological solution (elk, deer, wolves, managed together) than an economical solution. Needs to be more of an ecological concern than a human concern.
- W109: Don't support public wolf harvest.
- W120: Grazing on federal land, federal and state managers should handle conflicts there. Problems handled with aversive conditioning first before animal destruction. Maintain close to federal penalties for poaching or illegal taking.
- W131: Still outside interests will over-rule. Just like bison plan – good plan was taken away by public opinion, not the feds.
- W143: Plans have to be flexible and be prepared to change plans as needed according to prey etc.
- W146: What about economic benefits of wolves? Regarding Yellowstone... Why have a breeding pair benchmark? If wolves go up so much that they go more for livestock, then respond regardless of number of breeding pairs.
- W150: Landowner should have a right to haze or kill a wolf that threatens pets, bird dogs, lion dogs, etc.
- W151: wolves have become habituated to humans here because it is illegal even to haze them.
- W157: They learn to run when hunted.
- W171: Predators follow prey base. Don't manage for a single species. If too many deer, don't just shoot them off. Think of the big picture and predator/prey system.
- W175: I like the adaptive management approach.
- W178: I am concerned about the ability of people to lethally control wolves that are threatening livestock or pets.
- W179: Like to see stronger penalties for illegally killing wolves.
- W182: Biggest concern – definitely not in favor of public harvest.
- W185: I have an issue with moving from the breeding pair to the pack of 4 to determine breeding pairs. I have a problem with harvest. I like the idea of the permits.
- W189: I don't think they should be able to use lethal control or "threatening" livestock.
- W190: Emphasis on non-lethal methods. Would like to see Wildlife Services excluded from this whole process. People who are managing the populations should be doing the on-the-ground work.
- W192: Like #5. Think we need to move slowly until we work out all the problems, or until all problems are addressed.
- W200: Benchmark seems more like a limit. I question if hunting wolves is necessary in general. I think wolf numbers will be controlled enough through depredation actions.
- W201: Would like to start with alternative #5, go into it slowly. Eventually go into alternative #3. I feel we need wolves to regulate herds and numbers. We should
- W202: I like alternative #2. I think the compensation program is very important. I think the possibility of a hunt is important as long as there are enough of them. Hunting is an excellent management tool. It would be great if there were 2000 wolves in Montana with 50 permits. I think stock growers should have the right to take care of depredating wolves (as long as guidelines are followed).
- W238: 90% of problem with wolves would be eliminated if the farmer could be able to shoot them.
- W263: What happens if wolf pack gets rabid? Would kill a lot of other stuff.

- W296: Allow mixed classification to allow hunting and trapping both.
- W324: Under #2, landowners should be able to get a kill permit that others should be able to utilize.
- W326: Management plan needs to address public safety.
- W343: Alternative #2 offers flexibility. Gives people more options.
- W351: Leave up to landowners to manage.
- W370: Guard against numbers getting too low or we get federal control.
- W374: Not good to keep number of pairs at 10 because it limits ability to eliminate problem packs. Trade-off is more wolves.
- W397: There will have to be control by flying them and killing.
- W399: Alternative #2; wildlife management can address local concerns – good – each area’s different.
- W412: Alternative #4 -- why should landowner have to worry about controlling wolves? They’re in the cattle business.
- W473: Should have landowner kill permits with alternative #4.
- W475: Concern about conservative techniques for managing wolves e.g. translocation. They don’t work. Problem wolf has to be removed.
- W497: Be prepared to have hunting season on wolf population, but now it is too political.
- W499: Student of ecology and a farmer/rancher daughter. I can see the argument from both sides and recognize the wolf as a keystone species; however, I support the ranchers right to defend their livelihoods. I disagree with hunting/trapping wolves, but agree that ranchers should protect their property. Concerned with delisting; FWP should regulate how many wolves are taken. I support Alternatives #2 with these modifications.
- W503: Hunting is acceptable with a rifle; Trapping is barbaric. I prefer a bullet.
- W508: Disagree with public hunting for trophies, but agree that landowners should be able to protect their property.
- W521: Prefer a mix of Alternatives. Two and four – would like to see breeding pair from alternative 4 (13 pairs) and some hunting opportunity as in Alternative 2 in certain high density areas.
- W542: I support alternative 2. The draft is excellent. Allows the use of management tools in the most advantageous way. Funding for this alternative no different for other alternatives. Alternative 4 is the most expensive so not good. Alternative 2 is best compromise. Alternative 2 puts a good face on the whole program for Montana. I would compromise in the direction of alt 3 rather than alt 4.
- W545: I like Alt. 2. Landowners should have flexible tools because they are the ones dealing with the wolves. If I won a business, I have the right to prosecute shoplifters. The wolf is no different than the shoplifter if he is damaging my property. I would rather have the state have authority, but if feds provide a lot of funding they will end up with more control. State doesn’t have the money so what is the funding source?
- W563: Alt #3 would be flexible in terms of hunting opportunities.
- W564: As a livestock producer, I like Alt #2 because there is compensation, landowner flexibility to protect livestock and the fact it provides for regulated harvest.
- W580: Does it really matter if the “benchmark” is 10 or 15? Because FWP is managing it and they will manage it for whatever they think is right.
- W581: Is there a way to use the science of wolf behavior to better target problem animals and open up a new component to outfitter hunting?
- W636: Montana’s plan has to meet reintroduction goals and be driven by science.
- W652: Look at other countries and how they manage wolves.
- W658: Manage wolves like other species. Keep politics out – make it science based.
- W660: Alternative #2 is the best mixture to meet concerns of people as FWP addresses problem and wolves.
- W684: good goal – maintain viable wolf population; prey management should be balanced with wolf management.
- W696: They will come into people’s yards. They need to be managed accordingly.
- W701: Don’t oppose wolf harvest; rather see a harvest than wolf classified as a predator.
- W733: I am against research that restricts the general public, but doesn’t restrict researchers.

APPENDIX 5

- W747: Need to take a cautionary approach before utilizing hunting or trapping as a management tool.
- W754: I'd like to see a reduction as the first step in tags for ungulates rather than controlling wolf numbers.
- W758: I would like it better if there was no benchmark.
- W761: How will the non breeding wolves be managed?
- W769: How ill disease in the wolf population be addressed?
- W777: I'll go with #4. I've ridden horseback since I was a kid. I'm 80 – the wolves have always been here – no problem when they were left alone; increasing them will become a problem pretty fast.
- W792: I have problem with managing by a number.
- W793: Manage as a predator on private ground and as game on public ground.
- W802: Mange them according to the problems they create – they will go to areas where they are not being harassed and there is a prey base (elk deer etc.).
- W803: Manage wolves aggressively in conflict areas (where they get in trouble).
- W805: Can't micromanage wolves at the expense of other animals. Need to find a balance.
- W807: I don't like to kill wolves. I don't like to take care of other people's problems – I'd rather that they aren't out there.
- W812: Zone approach would be better than a numbers approach on Alternative 2.
- W813: If you are going to reduce #s, concentrate on the problem wolves or potential problem wolves.
- W816: Adaptive management will take a lot of intensive management. Cost a lot of \$\$.
- W829: Does any plan address the eco-tourism side of the wolf? It's big money in the park. With that there have been management issues. How do they manage permits for wolf viewing?? Like other special permits??
- W834: Wolves should be managed on federal ranges the same as on private ranges.
- W837: I want the flexibility to react to problems as they occur using my judgment.
- W839: Hunting is an important tool. Helps keep wolves wild.
- W844: Hypothetically, what would happen if you drop below a certain # of breeding packs – what time frame to adjust? Allow flexibility to get back to 10 in certain timeframe. If below 15 pairs, quit hunting/trapping.
- W860: If we start killing wolves, aren't we going to hear a "howl" from the public louder than wolves?
- W870: I like alternative #4 because of low 3s of wolves; management through hunting and trapping. ESA can take a hike.
- W871: Have one management plan and maintain stability of the plan.
- W901: If we don't manage them now, people will take matters into their own hands.
- W956: Should be able to remove a pack if it's a problem.
- W985: Do you think in 5 years that you will have better scientific tools to better address the wolf and other wildlife relationships?
- W995: Use a common sense approach. There has to be some way to take care of problem wolves – or the problem – sooner rather than later. I don't think you wait. You take care of the problem as soon as you can.
- W1030: Economy base/employment services in Paradise Valley are in jeopardy from wolves – aggressive management plan is needed.
- W1031: Where is this going to lead if don't manage like alternative 4?
- W1042: No problem with wolves in the area – they just have to be controlled.
- W1073: The best alternative is the one that allows the state the most flexibility and the greatest number of tools. Avoid national management.
- W1098: Could there be a bounty someday? Current wolf numbers are out of control.

APPENDIX 5

- W1099: I like alternative #4. I like the 10 pair limit and the landowner control. Compensation program now requires proof which is difficult. Why couldn't a compensation program be written into #4?
- W1057: What is the carrying capacity if they are left unchecked?
- W1131: What happens when wolf populations are kept at level of 10, 15, or 20 pairs and the elk population still declines?
- W1162: Public hunting of wolves is questionable. (Negative public image).
- W1163: Trapping is more negative.
- W1164: Trappers should have their leg in the trap?
- W1192: Concerned about public image of hunters if wolves are shot.
- W1197: If wolves lose their fear of man, will it be a problem?
- W1207: Opportunity should be distributed throughout the range of the wolves as population allow.
- W1212: I have a question concerning the definition of "breeding pair" and I'm concerned with that definition.
- W1217: Biological opinions/data about wolves seems to vary among biologists. Do a better job with data collection. Get the facts straight and be consistent.
- W1219: There needs to be regional variations in wolf management to address land use differences, habitat differences, and population differences (e.g. lion management).
- W1220: One general statewide plan will not work for all areas.
- W1221: Need to implement some sort of wolf management now as the wolf population and pack numbers continue to grow.
- W1232: Sportsmen want to be involved in managing by hunting or trapping.
- W1275: Wolves need to be delisted to allow management control before numbers explode here in northwest Montana. Should be hunting and trapping season and should be monitored and managed like other carnivores.
- W1281: Hate to see us in a situation where what happens to wolves is like other wildlife; FWP needs to be more responsive.
- W1301: All relocated wolves must have monitoring device on them (radio collar) – even under #1.
- W1312: State management will maintain stable populations.
- W1279: Set some quotas and goals established by the local people. It has to be based on the environment and people.
- W1328: Must have an alternative for everyone. Agriculture community could live with alternative 2, but add in zones as in alternative #4 (p91); manage migrating wolves more aggressively. Must delist first.
- W1350: Property and livestock owners should be able to remove problem wolves. Alternative #4 is best.
- W1375: Should take a close look at zoning wolves out of eastern Montana. This could reduce flexibility in western Montana.
- W1428: Once delisted, aversive conditioning an option.
- W1437: Adverse to trapping of wolves as a method of harvest because it is indiscriminate and non-target animals could be captured.
- W1445: Social tolerance will dictate wolf population along with habitat available.
- W1448: Want to have the ability to chase the wolves away from livestock and property.
- W1452: Like to see numbers fluctuate with environmental stochasticity. But might support #2 if no fixed numbers and there is more science and gathering of information from other studies and places. Only FWP control – no hunting or trapping.
- W1461: Need a program to harass/discourage wolves before there is a problem and need for control.
- W1464: Get private groups, university professors and students involved in collecting information on population numbers and how to discourage wolves before they become a problem.
- W1473: I do not understand how you are going to manage them.
- W3: 1. Alt 2 and 3 because each seems to persuade a balance between prowolf and antiwolf perspectives. 2. Alt 2 – increase breeding pair benchmark to 20 and ensure proper education for hunters taking part in wolf harvests.

W16: 1. Wolves should be removed from federal lists, but I don't believe farmers should just have a free range shot on them for interfering with their livestock, because it wouldn't only be farmers. It would be random punks shooting them because they know they could get away with it. Especially since wolves are wild animals which also need to eat much like humans. Yes, they highly affect livestock, but they're wild and it's their instinct. You can't actually help them from attacking livestock. Can't train them not to touch livestock. Wolves shouldn't be hunted. If they allow them to, sooner or later they'll be endangered.

W19: 1. Number 3 provides for a stable recovery and management system. A regulated hunt can be used if appropriate. FWP monitoring experience is more limited. Habitat connectivity is restricted; 2. 20 pairs should be a floor not a ceiling. State plan funding should be in place before implantation. Need clear standards on when wolves can be shot for preying on livestock. You should not permit it when they are just in the vicinity of livestock.

W21: Alternative 2. I am looking for FWP to manage wolf just like other wildlife. I am looking for management based on science, not politics. If one of the states fails to meet the plan request then are plan 5.

W25: 1. We should have vibrant, viable long-term conservation for wolves, and I believe Alternative 3 provides the option. Wolves can generate a lot of tourism dollars and help balance our Montana wildlife. Wolves should be managed like any other wildlife we have in MT -- elk, bears, mtn. lions, etc. 2. Let wolves act naturally in their environment. Create funding from tourism revenue to compensate ranchers who receive livestock losses. Rather than using reactive control measures (i.e. shooting, trapping), use public outreach in pro-active ways to avoid lethal measures.

W27: 1. Alternative 2 & 3. Larger #s of breeding pairs (relative to all alternatives), allowances for adaptive mgmt, compensation (but see below), shift of mgmt away from USFWS to MT FWP, consideration of prey base, consideration of livestock owners, continued monitoring. *How would monitoring be done? Concern that each of the 3 states holds to their "10 b.p." minimum in that no state perpetually operates below that minimum with the expectation that the other states will make up the difference. Also, that the agreement made by each of these 3 states' governors to accept this responsibility of a minimum of 10 bp will continue to be upheld, despite potential administration changes. 2. *Compensation issues -- 1) distinction between loss of livestock on private land v. public lands 2) potential for buying out grazing rights on land that is attractive to wolves instead of destroying every wolf that comes to that area. 3) Solicit funds for compensation from those with a vested interest in wolves (i.e. wolf supporters, cattle industry). *Increased outreach education with landowners/livestock owners to mitigate losses to wolves. *Management is science based and there is a continued partnership with FWP and universities to incr. our knowledge on wolf ecology. *# of breeding pairs should be less rigid and more flexible as more science on wolf ecology, carrying capacity becomes available. Concern that each of the 3 states holds to their "10 bp" minimum and that no state perpetually operates below that minimum with the expectation that the other states will make up the difference. Also, that the agreement made by each of these states' governors to accept this responsibility of a minimum of 10 bp will continue to be upheld despite potential administration changes.

W38: 1. Alternative 2. Give management to the experts -- research biologists -- compensation insurance -- administrated by locals, keep legislature out. Keep compensation program going -- Defenders of Wildlife. No trapping - very controlled hunt.

W42: 2. Set a low level for wolf packs. If packs reach that low level, then management actions will be activated to protect the wolves. Do not set a high level but manage the wolves so that the low levels will not be reached. Manage the wolves to protect the low established level.

W51: 1)#4 Montana FWP should have all flexibility with any alternative. 10 packs are plenty, as fast as they breed the population will be more we need or can manage, with out hunting season on them. The feds funded the program to transplant them from Canada. They should fund the control of them. 2)Rancher and other livestock owner should have the right to protect their animals, without the threat of stiff fines.

W59: 1)#2. Current population large enough to tolerate significant control (i.e. pack removed or severe thinning in Paradise Valley, Sun River) and to significant importance elk and deer populations in Centennial Valley, Gardiner, and Beartooth Wilderness. We need to study, observe more before adding more breeding pairs. 2)Institute limited trophy hunting ASAP to increase value of wolf to ranchers, outfitters and hunters who are currently aware to the wolf.

W63: 1)Alternative #1 Local feelings are unfriendly to wolves. All other plans have breeding pair limits that are much too low. Dept. of Livestock has an adequate compensations system. I totally oppose hunting wolves, as well as bears and mountain lions. Why waste scarce state funds when we can rely on federal dollars? 2)Nothing. More action is needed at the federal level.

W65: 1)Alternative #3, I like the higher more conservative 20 pair benchmark for maximum liberal management. I prefer this alternative approach to compensation. 2) The problem benchmark numbers should include clearer more definite distribution criteria so more liberal guidelines are triggered only if we have sufficient distribution. Northwest Montana needs to have a healthy population before more liberal management is permitted. Lethal control should target specific wolves, not random wolves or entire packs. Wolves should receive greater protection on public lands. No lethal killing of "problem wolves" on public lands.

W66: 1)Alternative #2 and #3 are closest to how I would like to see wolves "managed" in Montana however, Alternative 1 also has aspects I like. 2)Compensation in #3. There should be opportunities, tools, to prevent conflicts. 20 pairs should be minimum. I can't emphasize enough how different wolves are from other species. I hope you consider that when developing a management plan.

W75: 1)Alternative #1. Due to lack of science studies to establish appropriate predator/prey ratios in given regions (biomes) 10-15-20 or whatever is an artificial number. Need more research. Gather studies or any research from Alaska, Canada, especially Minnesota, to help establish appropriate predator/prey ratios based on a given region/space. 2)I would support alternative #2 if there was no set number of breeding pairs required. Wolf populations should be based on established research/studies of seasonal/regional/prey variances. I would support #2 if all control measures were conducted/supervised by FWP. There should be no regulation by hunting/trapping.

W76: 1) #2 appears to be the most "balanced" approach. Wolves were here long before I was and will be here long after I am gone. They are truly a majestic animal, but must be regulated so as not to disrupt big game populations. Want to see hunting and trapping allowed. Thanks for the chance to comment. 2) Wolves in the Nine Mile valley do not act like wild wolves. They have been habituated to humans, thus showing little fear or concerns

when encountering humans. I think that wolves attack/kill or injure pets (dogs including lion dogs, bird dogs) should be hazed or shot and killed just like livestock attacking wolves. I would like to see "hazing" allowed when wolves come too close houses, pets or humans.

W82: 1) Alternative #3 would be best for the future of wolves and a healthy ecosystem in Montana. Wolves are needed to control other predators and keep wildlife in balance. A compensation program would help. 2) Wolves should not be geographically restricted. They should be managed like lions and bears. Wolf harvesting should be regulated to limit distribution to pack dynamics and pup rearing. Montana should work with Idaho and Wyoming for regional goals. Increase education to limit wolf/livestock interactions. No trapping or general hunting, only in problem areas.

W85: 1) Alternative #5 while we wait for all states to develop plans. Increased local involvement. 2) Avoid the "benchmark" number of 15 instead manage wolf population using numbers and pack numbers, in such a way to minimize local effects on ranging and game populations.

W86: 1) Alternative #4. This is the best to cause minimum damage and still maintain a possible large ungulate herd in western Montana to provide hunting opportunities for the residents and maintain a viable hunting industry. Actually 10 breeding pairs is way too much, but due to the ESA the wolves were forced upon us. 2) This effort should all be paid for out of the federal government and no state money or license fees should go for this effort. Also it should not be managed by the FWP but rather be managed by the Montana livestock Department. We (Montana) should be paid by the feds for lost revenue due to reduced big game hunting opportunities.

W90: 1) Alternative 2 because it will be treated as a species in need of management. I like that they will be monitored. But also that the landowners have flexible tools to respond to conflict and decrease risks. 2) Thanks for involving the public!

W93: 1) Alternative 3. Greater number of wolves restores the ecosystem to a more historic state. Also allows for greater flexibility in adaptive management. Less likelihood of stochastic environmental events and other events causing the number of breeding pairs to drop drastically such that aggressive management is needed or possible relisting required. 2) There needs to be a compensation fund in place. It seems that excluding this option is a way to deter public from supporting this alternative.

W98: 1) Alternative #4, 10 breeding pairs would ensure a viable population in Montana. More wolves that this would undoubtedly harm livestock producers. When their economic future is in doubt anyway. 2) A hunting and trapping season could be set instead of a special kill permit.

W102: 1) Alternative #2. I think would best suit Montanans' needs. Why, because wolves definitely need to be managed and controlled to certain number at all times. 2) I think there should be wolf harvest by permits for over populated areas, like there is for elk and deer and other big game animals. Compensation could come from special permits.

W103: 1) None, because right now we are already in the 10-20 breeding pairs now and problems are snowballing out of control now. If the recent control actions had not happened I think we would have been looking at a lot of loss for our industry in this area. 2) I think that if the wolf population was kept to a number that domestic problems were few and far between (like bears or lions) then we could all live with it. Also I think the funding should have been dealt with before the first wolf was set loose.

W112: Alternative #4. Less numbers, less problems. No state funds.

W116: As landowner a taxpayer and one who raises cattle, I believe that if the people want to see wolves in the National Park, fine. I believe if they leave the parks and the wilderness areas they should be considered a predator and have the same status as a coyote.

W118: 1) Mostly #2. A combo of 2 and 4. Maintain flexibility with fewer pairs. 2) Less pairs in #2 and/or consider total numbers not just pairs.

W120: 1) Alternative #2. The public has input to state and local governments and also there may be possibility for public hunting. FW&P manage wildlife and prey species now, so it is only feasible that they handle wolves. Management needs accurate counts. 2) The federal government should foot most of the bill for compensation. They insisted that we have wolves so they should help with future compensation programs.

L0126: 1) Let us get rid of all the wolves in Montana and if people want to see wolves they can go to Canada where there are a lot of them it will save us many millions of dollars. This looks like some bureaucratic waste of money for nothing.

L0001: 1) FWP preferred alternative #2 represents excellent work by these professionals, allows them to use their management tools most efficiently. Get ahead of the curve, let Idaho and Wyoming look like sour pussies. Let's use alternative #2 till we reach a future natural balance then fine tune from there. 2) I think Alternative 2 is best choice – then if we need to compromise or fine tune, compromise in direction of alternative #3, not 4 which is way too radical, heavy handed and doesn't use the FWP to the best of its use.

L0023: I ask that you not allow citizen-shootings or poisonings of wolves under any circumstances. It is important to keep game levels adequate – wolves do diminish stock of elk and deer, and not being an expert, I ask only that you allow wolves to take their fair share. I would prefer you choose option #3, and I actually hope you expand the breeding pairs allowable. Man, with a little effort, can learn to live with wolves and they would be wonderful to see and hear on one of my trips to Montana. My second choice would be the alternative now preferred by you, option #2. I am adamantly opposed to both options #1 and #4. The wolf is part of the reason I love Montana and spend my vacation money there – it's natural, unlike Chicago where I live. I am not opposed to paying double the amounts for licenses to fund a program that maintains a healthy wolf population in your state. I will consider visiting elsewhere (British Columbia for example) if you adopt a program that deals too harshly with the gray wolves.

L0026: They are an important part of the ecosystem, and have a right to their place on the planet as do all living things. Certainly farmer and rancher have a right to protect their cows, sheep and other livestock. So my proposal is that wolves can only be killed when a farmer or rancher seems them attacking his livestock, or an attack is imminent. The farmer or rancher must then report the killing and/or sighting of the wolf in the vicinity of his livestock to the appropriate FWP agent. Only with these strict rules can we hope to save the wolf from those who wish to exterminate this beautiful animal.

L0029: Manage the wolf as a game animal.

L0036: Of the alternatives presented, only "No Action" appears to satisfy the basic legal and biological requirements of the Endangered Species Act. Any action alternative should, in my mind, adopt the principles of sound conservation biology. FWP should not adopt a wolf conservation and management program until these minimum standards have been met. Until that time, wolves should remain on the endangered species list and the U.S. Fish and Wildlife Service should continue to manage wolves in Montana. A benchmark of 15 pairs, 20 breeding pairs, or 10 breeding pairs in Montana each fail to achieve minimum viable population levels. Neither will an agreement with federal authorities to employ the Advisory Council's recommendations to manage wolves and resolve wolf-related conflicts achieve viable population levels. Wolves may have met federal "recovery goals", however these goals do not accurately represent a recovered population. USFWS has not conducted a population viability study based on scientific evidence. The arbitrary "15 pack" level proposed in the preferred alternative is simply a number that has been assigned and has not been tested and proven to produce a viable wolf population. Wolves exist in 10% of their native range. Scientific studies must be conducted to determine what level of occupation and distribution of their native territories constitutes "significant" distribution levels. These studies have not yet been conducted. The scientific literature on long-term viability for genetic concerns alone requires an effective breeding population size of at least 500, which translates into total population size in the thousands. No sustainable mortality level has been calculated. And no analysis of migration corridors needed to maintain adequate levels of genetic interchange throughout the region has been prepared. To date, wolf recovery and management in the Northern Rockies has been politically driven. Until there is an adequate consideration of the best available science, as required by the Endangered Species Act, the No Action Alternative is the only option that satisfies the minimum biological and legal requirements of the Act.

L0040: The plan must include and adopt a wolf conservation and management plan. If not, all the effort, people, hours and hard work to bring them back will be in vain. Make sure there are strict guidelines for illegal wolf kills. Keep large uninhabited areas for them, and make special provisions for times in the season when pups are born. Don't let what Wyoming is doing to the wolves happen to yours, have better plans in place for the wolves. And there has to be boundaries on where the livestock can graze. Let the wolves have some habitat where grazing is not allowed. The rancher's cannot be allowed to have control over public wild land. Wolves have more rights in this habitat. Please put long-term conservation and protection for them please to think about being alive on this planet without wolves also is unthinkable for me. I urge you to put right fair provisions in place and do not allow public hunting or trapping of them. Please ban this forever.

L0046: Please put me down as another MT citizen in favor of a designated hunting season for wolves for both rifle and bow hunters. As with black bear or mountain lion, a drawing would be appropriate. It should NOT, however, be limited to 2 wolves per year.

L0057: I believe that wolves should be managed like other wildlife, such as elk, bears, and mountain lions. They should not be managed as if they were livestock. There should be no artificial limits on population or location for wolves. Also, the minimum number of breeding pairs should be at least 20 or more as outlined in Alternative 3 of the draft plan, to assure long-term survival. Provisions for the killing of wolves by citizens should be clear and specific, permitted only when wolves pose an immediate threat to people, pets, and livestock. I think that funding for state wolf management should be assured before the plan is finalized. Key areas of habitat should be protected during denning season. It should maintain large, wild areas where wolves and their natural prey are secure from excessive disturbance from people. They need their own territory. Wolf-related tourism brings in revenue to the hotels, restaurants, shops, and guides in communities surrounding the Park, much of it during their off-season. Wolves are responsible for less than 1% of livestock losses. Wolves also promote a balanced carnivore community. The presence of wolves in Yellowstone National Park has created a more diverse and even grizzly bear feed on wolf kills. At the same time, wolves have reduced the number of coyotes in the Park, allowing other predators the opportunity to fill the ecological vacuum. The best choice seems to be alternative 3. It makes the wolf as a species in need of management, providing full legal protection for wolves. It has the highest population benchmark before aggressive management tools are used. This is set at 20 breeding pairs. I think that this should be the very minimum for the wolves' self-preservation. It also set clear and specific rules for when citizens can kill wolves that are threatening people, pets, and livestock. Wolves are wonderful valuable animals as individuals and they are also an important part of the scheme of things where nature is concerned. Please see that they are valued, protected and taken care of on a permanent basis.

L0070: Montana FWP's preferred alternative, called the Updated Council Alternative, to managing wolves upon delisting would take some good actions in ensuring that wolves successfully remain in the state in healthy numbers. In particular, I believe that requirements to maintain wolf-travel links between Montana, Wyoming, and Canada will be a sound management practice. This provision, however, needs to be extended to Idaho as well, as wolf movement between Montana and Idaho will also ensure that they remain healthy in the state. Since the process began, FWP has done a great job making sure that the public has had a hand in the planning by carrying out the required meetings and public comment periods. Continued public involvement and feedback will be key in making sure that this plan is successful because if the public isn't happy with it, its chance for success drops. FWP seems to recognize this very well, but it doesn't seem that they recognize the need for other kinds of public involvement. By this I mean that the public needs to be involved not just by giving feedback, but in education about wolves and their important roles in the ecosystem. They long held and horribly mistaken belief that wolves are dangerous and bloodthirsty predatory needs to be changed if the state is going to pay such close attention to public views. These erroneous beliefs are not based on fact, and so the management of wolves cannot be based on these unfounded fears. FWP's preferred alternative seems designed to simply keep wolves from becoming endangered again and not necessarily ensuring their full recovery or biological success. The first major flaw I see is in setting the management benchmark at 15 breeding pairs. In light of (the) estimate that there are currently 14 breeding pairs in Montana, this allows for little growth before heavy-handed management can step in to remove, kill and rearrange. This also implies that the number is based on pacifying special interest groups like ranchers and hunters, rather than allowing growth when the ecosystems of Montana can surly support more than this number (as the Additional Wolf Alternative implies with a benchmark of 20 breeding pairs). Instead, a minimum number should be set, perhaps at 20, but wolves should be allowed to grow well beyond that, limited only by what the ecosystem can support. Nature will surely be better than humans at deciding how many wolves are permissible. The second serious problem that I find with the preferred alternative is that it does not outline appropriate ways to handle the concerns of ranchers and livestock depredation. Emphasis needs to be placed on preventative measures, such as electric fences or guard animals, rather than management when an incident of depredation occurs. Depredation by wolves does occur, but when the numbers are examined, it becomes clear that ranchers blow the losses way out of proportion. Because of all of this, the plan to manage wolves needs to recognize that ranchers take on certain risks, and wolves should not be killed for a few lost livestock. Instead, management needs to occur heavily at the prevention level, changing human behaviors and not killing wolves only when the incidents occur. This doesn't work, as more wolves will move into the area, setting up a cycle of needless killing and frustrated management. The final part of the preferred alternative that I feel will not ensure the long-term success of wolves in Montana is the provision that will allow wolves to be hunted when they reach sustainable levels. With all of the work and money that has gone into reintroducing wolves and making sure they are successful, this seems like a giant step backwards, reminiscent of the days of bounty hunting and extermination. In addition, this just seems to be an attempt at pacifying another special

interest group that feels wolves are taking away from their game animals. This is another area where there needs to be much more public education on the important roles wolves play in ecosystem health. The management plan should not allow for hunting of wolves, and instead should seek to educate the public, especially hunters, on the benefits that wolves can actually provide for them.

L0085: My concern is for a workable long-term wolf conservation. Please develop a plan that includes funding of the state program. Provisions for when citizens are allowed to kill wolves should be clear and specific, permitted only when wolves pose an immediate threat to livestock. The minimum number of breeding pairs should be at least 20 and wolves should be managed like other wildlife with no artificial boundaries or limits. Montana is a great area as its wolf population makes it even better. Thank you for assuring a future for wildlife.

L0093: Regarding wolf management, I'd like to point out the following: 1) Funding of the state program must be assured before the plan is finalized. 2) Provisions for when citizens are allowed to kill wolves should be clear and specific, permitted only when wolves pose an immediate threat to livestock. 3) The minimum number of breeding pairs should be at least 20, as outlined in Alternative 3 of the draft plan, to assure long-term survival. 4) Wolves should be managed like other wildlife, such as elk, bear and mountain lion, with no artificial limits on wolf numbers or boundaries. Wolves are good for Montana's ecology, economy, and culture. Wolves in Montana: Promote healthy big game populations; Generate \$20 million in tourism (NPS); Manage coyote and other predator numbers; and, Cause less than one percent of all livestock losses annually (Montana Agriculture Statistics Service).

L0121: Even though Alternative 2 does not fully come into agreement with me- it comes the closest. The other alternatives are filled with issues too controlled by the federal government this forcing one to choose this alternative. Number 2 is the least restrictive with some issues I'll comment on. I feel our MFWP can manage and address the wolf management concerns well with out federal intervention. My two biggest concerns with Alternative 2 are in the area of FUNDING and WOLF HARVEST. I don't know where all our funding will come from but hopefully huge money groups such as Ted Turner, Defenders of Wildlife etc. will not be allowed to influence our people in FWP or at the legislative level. Possibly the wolf tags for hunting and trapping would generate monies strictly for wolf management/harvest. Due to constant monitoring needed to appease pro-wolf groups there'd be a demand for extra funds. Why not have a "Wolf" license plate for the state of Montana so that those who so desired to support wolf management whether for hunting, trapping, sightseeing could support this with all the monies to go to the wolf management program. Similar to the park plates. It would be desirable to have wolf education programs to educate the public with documentaries showing all aspects of the wolf- birth to death. But tell the whole truth not just the fuzzies about them. There's a need to get on with our program NOW by also classifying the wolf as a furbearer OR big game animal. I could see the lack of doing this delaying our de-listing by months/years! There definitely needs to be a regulated wolf harvest on the Alternative # 2 not leaving the word possible there.

L0150: 1)The wolf should be eliminated; this was the dumbest idea that they (FWP) has had since the ferret and the prairie dogs. 2)It should be put into affect right away.

L0160: Would like to see the state install the same type of regulations that would follow the great insight of the state of Wyoming so that land owners and concerned citizens could shoot at will all wolves that are seen on public or private land other than certain national parks and state wildernesses, designated as safe havens for them. History itself should be enough reason to pass such laws. 31 of 48 said they will carry their weapons with them in an attempt to eliminate every wolf they see. So you can see that many are willing to become outlaws to try in what might be a futile attempt to slow the slaughter of our precious game animals. I hope you decision aligns with ours. We really don't want to break any laws, so think about passing laws we can all accept, not just the environmentalists.

L0182: 1)Alternative #2 in the end. #5 for now. The wolves should be controlled per harvest. 2). N/A.

L0183: Thank you for the opportunity to comment on the Montana Gray Wolf Conservation and Management Plan Draft Environmental Impact Statement (Draft EIS). Please accept these comments on behalf of Predator Conservation Alliance (PCA), a non-profit wildlife conservation group based in Bozeman, Montana, working to improve coexistence between people and predatory wildlife in the U.S. northern Rockies and High Plains. Predator Conservation Alliance includes 1000 members nationwide, including more than 100 Montana residents, who greatly value the restoration of a healthy wolf population distributed across suitable habitat in Montana and throughout the northern Rocky Mountain region. We appreciate the opportunity to comment, and we support many aspects of the Preferred Alternative described in the Draft EIS, which we believe is a solid first step toward this goal.

PCA's overall position

PCA supports a modified Alternative 3 that includes a compensation program for wolf depredations as described in the Preferred Alternative (Alternative 2), because we believe that this best ensures long-term wolf restoration in Montana. In addition to the additional breeding pairs proposed in Alternative 3 — which would provide an important extra safety margin between endangered versus liberally controlled and hunted — PCA also favors the proposed “annual workshop and interagency coordination meeting” over the “standing advisory council” format for future wolf management decisions in Montana, because we believe that the former is more democratic, provides easier access for the concerned public, and there is a successful precedent for this format embodied in the Interagency Grizzly Bear Committee.

PCA's specific comments

As mentioned above, PCA supports many aspects of the Preferred Alternative as a strong start toward successful long-term management of wolves in Montana. First off, PCA supports and appreciates the acknowledgement in the first paragraph of the Preferred Alternative that “wolf restoration is fundamentally consistent with Montana’s history of wildlife restoration and conservation” (p. 69). PCA looks forward to the day when wolf populations are healthy and widely distributed in Montana and across the U.S. northern Rocky Mountain region such that wolves can be managed like other healthy wildlife species, including elk, black bears, and mountain lions, for example. PCA also supports and appreciates the following fundamental strengths of the Preferred Alternative:

- No artificial limits on maximum wolf numbers in Montana
- No artificial boundaries that exclude wolves from suitable habitat in Montana
- No immediate hunting of wolves following delisting (we support the proposed “species in need of management” designation).

PCA urges the following improvements in the Preferred Alternative:

- Population Goal — We support and appreciate the revised population goal from 15 “packs” to 15 “successfully breeding pairs” of wolves in Montana, since reproduction is the key parameter to measure the conservation status of a population, but as mentioned in our initial comments we urge that this goal be increased to 20 breeding packs, as proposed in Alternative 3. As mentioned above, this would provide an extra safety margin between

endangered versus liberally controlled and hunted, which is especially important since Montana harbors all of the northwestern Montana wolf population, plus part of the Greater Yellowstone population, and perhaps even one or more wolf packs associated with the central Idaho wolf population: each of which must be managed in excess of ten breeding pairs to ensure long-term wolf viability. Montana also contains much of the key habitat that connects these three populations, so additional wolf packs in Montana would also enhance the probability of successful connections between the three populations, the importance of which is described well in the Draft EIS (p. 31).

•**Habitat Protections** — We acknowledge that Montana FWP has limited authority over the management of many areas of wolf habitat, but the same holds true for elk, and we submit that FWP has been a powerful force in ensuring the long-term protection of many areas of habitat vital to elk productivity. In this same manner, we urge FWP to be a firm advocate for protecting habitat for wolves, especially in those many cases where such protections will have cascading benefits for a full suite of wildlife and the ecosystems of which they are a part. As mentioned in our scoping comments, FWP should work with land managers to keep unroaded areas unroaded (since wolves are typically killed in close proximity to a road); restore roaded areas to a maximum road density of 0.9 miles per square mile or less (as recommended by the best available science regarding the effects of roads on wolves), and provide special protections for wolf den sites during the few months in the spring when those sites are active.

•**Mortality Protections** — As mentioned in our scoping comments, PCA believes that until minimum wolf recovery goals are at least doubled and 20 breeding pairs are achieved in Montana, private citizens should not be allowed to kill a wolf unless it poses an immediate threat to human life or livestock. We appreciate the language in the Preferred Alternative that emphasizes non-lethal means to manage wolves below 15 breeding pairs (p. 73), but again we urge that this threshold be increased to 20 breeding pairs. We oppose the issuance of “FWP kill permits” that do not specifically target offending wolves only. Similarly, we oppose hunting and trapping of a wolf population below at least 20 breeding pairs that is not selective against specific depredating wolves.

•**Conflict Management** — We appreciate that FWP will have the ultimate responsibility for resolving wolf/livestock conflicts as described in the Preferred Alternative (p. 76). To ensure that the concerns of livestock producers are balanced with the needs of wolf conservation, PCA urges an active presence by FWP officers on the ground where conflicts occur, in addition to contracting with field personnel from USDA Wildlife Services and Montana Department of Livestock.

•**Compensation** — As mentioned above, PCA urges FWP to adopt a compensation program that reimburses livestock producers for confirmed and probable losses due to wolves, because we believe that this type of program helps to build tolerance for wolves, and can provide a means by which the people who benefit from wolves can help to share the costs of wolves. We support a compensation program that emphasizes prevention of conflicts, in addition to reimbursement of conflicts after they happen, perhaps modeled after an insurance policy where livestock producers have a positive incentive to reform their livestock practices in cases where it may reduce their risk of losses due to wolves.

•**Administration/Delisting** — As mentioned above, PCA supports an annual workshop and interagency coordination meeting to address long-term wolf management in Montana as described in Alternative 3 (p. 88). PCA and many other groups and individuals with interest and expertise in wolves have had limited access to influencing the development of Montana’s wolf policy by the advisory council. We appreciate the Council’s hard work thus far that has contributed to a plan that we largely support, but we would appreciate a more democratic process for Montana’s wolf policy in future. Also as mentioned above, one model for public participation is the Interagency Grizzly Bear Committee, which holds regular meetings between land and wildlife agency officials where the public is invited to attend and participate.

•**Information/Public Outreach** — A long-term commitment to wolf education and outreach is vital to a successful wolf management program in Montana, and as mentioned in our scoping comments, PCA offers to work with FWP to develop and distribute factual, science-based information about wolves in the U.S. northern Rockies via printed materials, presentations, media events, school programs, and other outreach efforts.

•**Funding** — PCA acknowledges the difficulty of funding management programs for wolves and other non-game species in Montana, and we appreciate FWP’s commitment in the draft EIS to secure this funding. We are convinced that the economic benefits of wolves far outweigh the costs, but creative solutions are needed to capture these benefits to compensate those people who incur the costs, and to fund long-term wolf management. Some initial ideas to consider might include a wolf license plate, to generate revenue for wolves and other non-game species, and a wolf visitor center with wolf-related merchandise, that could fulfill a dual function of education and a revenue source for wolves. Prototypes for the latter include the Lewis and Clark Visitor Center in Great Falls, and the bighorn sheep visitor center in Dubois, Wyoming. PCA also supports and appreciates FWP’s efforts to secure federal appropriations to help offset the costs of managing both wolves and grizzly bears, two outstanding natural resources of our region with national and world-wide significance. Finally, PCA believes that the costs to manage wolves should decline once they are fully restored in Montana, whereupon they no longer need to be intensively managed and monitored, and management costs should be comparable to current expenditures on bears and mountain lions.

Additional comments

PCA would like to take this opportunity to comment on FWP’s wolf policy outside the immediate scope of this plan:

•**Wyoming’s Wolf Policy** — In addition to completing its own wolf management plan, PCA urges the Montana Department of Fish, Wildlife and Parks to do what it can to improve Wyoming’s current wolf policy, which we believe presents a serious obstacle to de-listing because of the proposed designation of wolves as “predators” with no protections throughout most of the state. We applaud the Montana FWP Commission and Montana’s governor for their work in this regard thus far, and we urge that these efforts be redoubled until Wyoming can be convinced to improve its policy.

•**U.S. Fish and Wildlife Service’s National Wolf Reclassification Policy** — PCA also has concerns that the U.S. Fish and Wildlife Service’s proposed expansion of the wolf recovery program for the U.S. northern Rockies to include nine western states — most of which have no wolves and no wolf protections — may present a further obstacle to the timely delisting of wolves in the northern Rocky Mountain region. We urge Montana FWP to convince the U.S. Fish and Wildlife Service to confine its de-listing proposal to the three-state area of the northern Rockies where wolves are biologically recovered.

Thank you and the governor for your work to develop a program that will ensure the restoration of wolves to suitable habitat in Montana, for the opportunity for PCA to comment, and please continue to keep us informed of any developments.

L0184: I agree that the preferred alternative with the adaptive management concept is an appropriate management direction for Montana. It is appropriate to recognize the tribes’ authority on the seven reservations in Montana but it also raises a question about the adaptive management concept. Since the tribes have wolf conservation and management responsibilities on the reservations does FWP intend to count wolf packs that occur on reservations when tallying numbers that signal changes in adaptive management strategies? If wolves are no longer protected by federal regulations a tribe could conceivably adopt any management strategy it chooses on its reservation. Tribes may choose a management strategy far less conservative than that indicated by the state’s adaptive management process. It may be necessary to negotiate formal agreements with Indian tribes to coordinate monitoring, management and regulated harvest of wolves to ensure the effectiveness of a statewide management strategy.

L0187: 1)Alternative 2 best covers what Bangs and the state of Montana biologist proposed. They stated 10 established packs in state prior to a regulated wolf harvest. Wolves are in excess of this number so Montana has the responsibility to manage now. 2)Regulated wolf harvest.

L0190: Any wolf plan to introduce wolves into eastern Montana would be extremely detrimental to stock growers and landowners. Hunting is also a large factor in the local economy. The business that rely on the thousands of hunters that visit our area each hunting season would be severely affected by introducing wolves. Landowners that withdraw their acreages from the block management program and landowners that close private lands to hunting would greatly affect the economy of the central Montana area. We strongly urge no consideration be given to introducing the Montana gray wolf in eastern Montana.

L0228: Agriculture represents a major portion of Garfield Counties economic stability; Wolves have historically been detrimental to animal agriculture. We disapprove of reintroduction of wolves to Garfield County.

L0229: We support alternative 3 because it sets the number of breeding pairs at 20 before changing management strategies from conservative to liberal, provides full legal protection for wolves and sets clear and specific rules for when citizens can kill wolves that are threatening livestock.

L0205: 1)Alternative #5. This alternative has the most flexible strategy, keeps more management options open. It will insure a 90/10 financial split with the feds. Alt. #2 is reasonable and flexible enough to keep wolf recovered. Alt. #1 keeps the wolf listed, which is not good. Alt. 4 sets the sideboards too narrow for a species with a highly variable reproduction potential. Alt. 3 is "perfect" but we don't work in a perfect world. It's unreasonable due to social tolerance limits. 2)Federal money always comes with strings attached. MT cannot afford to shoulder the burden alone. For a national resource protected by a national mandate.

L0208: 1)They should eliminate every wolf in the state. They are devastating the elk herds and calves. Moose populations have declined. 2)I would implement the 3'S shoot shovel and shut up.

L0219: 1)#2 updated council. Like compensation program for ranchers. Like FWP control. Like future prospects for predator management, hunting, trapping. Like balanced scientifically based approach. 2)Please continue to study the impacts of wolf introduction on hunting elk populations and impact on outfitters. If further research shows impacts, develop mitigations measures.

L0229: We support alternative 3 because it sets the number of breeding pairs at 20 before changing management strategies from conservative to liberal, provides full legal protection for wolves and sets clear and specific rules for when citizens can kill wolves that are threatening livestock.

L0233: Blend of alternatives #2 and #4 best represent my concerns. Least amount of wolves. 15 breeding pairs are too many wolves. I see no reason for the state of Montana to assume responsibility for harboring 50% of the required total. Wolves should be monitored aggressively and that a cap of 11 or 12 pairs is more in line with our share of the burden placed on the states. Should be managed to Parks, wilderness or backcountry areas. Major concerns is the lack of credibility with federal wolf managers. Montana should assume all responsibilities within our state. Removal of excess wolves or those causing stress/harm to livestock. Assume the responsibility for investigation of landowner complaints and take immediate action. Pay compensation directly. The state should be the entity to create and follow this definition. Investigate whatever funds available form the federal level. Do not believe that a partnership with private organizations is a good idea. Some form of tax benefit should be created for those who suffer from wolf predation. Issue "kill permits" when needed. No penalty for landowners defending livestock or pets under harassment from wolves. 4 wolves traveling together in the winter is very lenient. Two wolves traveling together are probably a breeding pair during the winter. No special protective treatment on private property, does not mean they can be killed on site, but no measure that would restrict landowner from his rights. I do not believe that wolves should be tolerated on wildlife management areas. I do not want to see my money spent on feeding the wolves. I do not want to see any road closures due to wolves. I really don't care about hunting wolves.

L0234: It was unanimously decided by the club to reject all 5 alternatives. We want the wolf to be declared an unmanaged predator with the same rules and regulations as those of other unmanaged predators such as coyotes.

L0237: I concur with the MSSA position on the wolf EIS

L0239: On behalf of the National Wildlife Federation (NWF), please accept these comments on Montana's Draft Wolf Conservation and Management Plan. The NWF was founded in 1936 as the national voice of state and local conservation groups, and has since emerged as the nation's foremost grassroots conservation organization, leading an integrated network of members and supporters and 47 affiliated organizations throughout the United States and its territories. We appreciate the opportunity to comment on a plan that we think not only addresses wolf management issues, but also helps to build broader public support for wolf conservation.

From the outset of the roundtable process, the efforts of the Montana Department of Fish, Wildlife and Parks (MDFWP) to craft an adequate plan for wolf management have recognized that building support for wolf conservation requires not only the incorporation of good wildlife science, but also the acceptance of wolves by the larger public. The roundtable process brought a diverse group of stakeholders together, and through the MDFWP's leadership, an adequate and thorough management plan emerged. The process itself helped develop a broad base of support for the state plan that will greatly help in the transition from federal to state management of wolves.

The National Wildlife Federation endorses Alternative 3. This adopts the Wolf Management Advisory Council's Planning Document, but increases the number of breeding pairs that triggers a change from conservative to more liberal management tools from at least 15 to 20. The state plan relies almost entirely on a population objective based on number of breeding pairs and includes, for example, no specific requirements for geographic distribution of these pairs. We believe that it is important that wolves be allowed to thrive in many areas of Montana and, if specific geographic distribution criteria are not part of the plan, that a larger number of breeding pairs may be an adequate surrogate to assure an adequate distribution of wolves across the state.

We strongly support many parts of the draft plan that are common to both alternatives 2 and 3. Specifically, we agree with the following.

- No artificial ceiling of wolf numbers in Montana.
 - No boundaries that exclude wolves from suitable habitat in Montana.
 - No immediate hunting of wolves following de-listing (we support the proposed "species in need of management" designation).
- The plan should not allow private citizens to kill a wolf unless it poses an immediate threat to human life, livestock, or other property. Stewardship methods that reduce conflicts should be implemented before lethal control measures. Control measures should be selective against offending wolves only.

We agree that an adequate compensation program for livestock losses to wolf predation is a key element in establishing social tolerance for wolves and other predators that can adversely affect livestock producers. The current plan sidesteps the details of how to accomplish this program and establishes only a process to this end. We believe that ultimately a state-funded compensation program, similar to Wyoming's, will be the most workable solution. We believe this should be funded from the general fund and not from hunter fees.

We are pleased that the plan includes a section on Recreational and Social Values associated with wolves and other species (Chapter 2). It is unfortunate that more information on the consumptive values associated with wolves and similar species is not available for areas other than National Parks. We hope that this deficiency can be corrected with more broadly based studies in Montana.

Finally, we believe some thought should be given to greater coordination with the states of Idaho and Wyoming. Efforts by wildlife professionals in Wyoming to develop a plan that will meet the Endangered Species Act's (ESA's) requirement for adequate regulatory mechanisms are frequently frustrated by ill-informed intransigence at the political level. Montana should continue to try to influence Wyoming and Idaho to assure that appropriate regulatory mechanisms are in place throughout the three-state region. All three states should work together to ensure that wolf numbers remain healthy and well beyond levels that would trigger a debate over relisting the species under the ESA. Specifically, Montana should pressure Wyoming to pass legislation similar to Montana's SB163.

Thank you for the opportunity to comment, and please keep us informed of any developments.

L0241: On behalf the 200,000 members and supporters of The Fund for Animals (The Fund) nationwide, including our members who reside and recreate in the state of Montana, please accept the following comments on the Draft Environmental Impact Statement/Montana Gray Wolf Conservation and Management Plan (DEIS).

To preface our comments, The Fund supports Alternative 1, the "No Action" alternative. We contend that wolves should remain under federal jurisdiction at this time due to the demonstrated disinclination or inability of decision-makers within Montana, Idaho and Wyoming (the three states currently inhabited by the northern Rockies wolf population) to afford predator species in general, and wolves specifically, adequate protection. Nothing could better exemplify this problem than the state wolf plans developed by Idaho and Wyoming to date and many provisions within this DEIS. In fact, statements throughout the DEIS reveal that prejudice against wolves still flourishes among certain segments of the Montana citizenry and even festers within the very department seeking management authority for these animals.

On the one hand, the DEIS touts the importance of Montana's agricultural and wildlife conservation heritage by declaring that the "rural characteristics of one affirm the other" (DEIS, p. 59); on the other hand, there is relatively little acknowledgement that it is precisely these two sectors of the population (ranching and hunting/trapping interests) that were in the past responsible for wolf extirpation, and are today creating obstacles to long-term recovery and viability of wolves. Despite the time that has elapsed since wolves were extirpated from the region and the knowledge we have acquired about their ecological importance in the interim, it is painfully obvious that the interests responsible for their extirpation in the first place have a stranglehold on management direction for the future. In fact, the DEIS unjustifiably focuses almost entirely on management practices that will satisfy the concerns and allay the fears of this minority within the Montana population. For all intents and purposes, FWP has lost sight of the needs of wolves. Furthermore, the DEIS fails to objectively and comprehensively evaluate the economic importance and environmental impacts of livestock ranching both locally and regionally, assuming wrongly that the loss of agricultural enterprises in certain areas will automatically translate into adverse impacts on wildlife conservation.

Until state agencies charged with wildlife conservation demonstrate that they are, so to speak, capable of "taking the bull by the horns" in order to manage wolves and other imperiled wildlife responsibly, we contend that federal agencies must maintain management authority for these species. However, we offer the following comments for consideration, if and when, the state of Montana assumes management authority for wolves.

While the DEIS acknowledges that wolf management will not be easy (DEIS, p.69), management will be impossible without sufficient, dependable and sustained funding. Yet, according to the DEIS, implementation of Alternative 2 (Updated Council), FWP's preferred alternative, and all other alternatives other than Alternative 1 is contingent upon securing adequate funding for each of the program elements. Until such time as the state of Montana can assure the United States Fish and Wildlife Service (USFWS) that it has guaranteed funding for the purpose of implementing all the elements of a responsible state management program, it is premature to even consider transferring management authority to the state. The welfare of wolves cannot be based on pipe dreams. If the state of Montana wants the public to take its management proposals seriously, then it must identify how it will fund the provisions of the proposals.

Even placing aside this conspicuous deficiency, all alternatives other than Alternative 1 in the DEIS are filled with so many unknowns that it is impossible for the public to evaluate the environmental and cumulative impacts of what is being proposed. The following excerpts from the preferred alternative (with emphases added) illustrate a few of the numerous uncertainties within the plan:

 "As part of the tri- state coordination effort, Montana 'may' seek an agreement or MOU with Idaho and Wyoming to clarify which state counts which wolf 'packs' within the context of their state's management program so that all wolf packs count toward the tri-state recovery requirement and individual packs are not missed or counted twice" (DEIS, p. 74)

 "When the wolf population no longer fits the definition of a species 'in need of management' or when wolf numbers have increased and population regulation is needed, the FWP Commission 'may' reclassify the wolf as a big game animal 'or' a furbearer." (DEIS, p. 73)

 "FWP 'may' re-examine the current 72-hour reporting requirement (MCA 87-3-130) when a wolf is killed or injured in defense of life or property." (DEIS, p74)

 "If reliable data indicate that a local prey population is significantly impacted by wolf predation in conjunction with other environmental factors, FWP would 'consider' reducing wolf pack size." (DEIS, p.75)

 "FWP will intensify ungulate monitoring efforts and 'consider' habitat enhancement projects where wolf packs are established." (DEIS, p.75)

 In reference to the term "threatening to kill" – "Formal definitions of these terms 'may' be adopted during subsequent administrative rule-making through the FWP Commission." (DEIS, p. 81)

If FWP expects the public to offer informed comment, it must know precisely how the state of Montana will manage wolves, not how it "may" manage them or what it "may consider." The omission or inclusion of certain provisions of a management plan may have significant impacts on the plan's success or failure. Likewise, the public must fully understand the criteria used by the FWP to make management decisions. What will trigger a change in classification for wolves? What constitutes "reliable" data and "significant" impacts to prey populations? Formal definitions of essential terms, such as "threatening to kill," must be known prior to evaluating impacts. The DEIS frankly does not provide the clarity and specificity needed for the public to even begin to assess the appropriateness and adequacy of Montana's preferred alternative or other alternatives.

Similar deficiencies permeate the document. For example, research and monitoring needs are not definitively described, are contingent upon funding availability and appear to be biased toward wolf interactions with wild ungulates because of the hunting and outfitting community's unfounded trepidation that wolves will compete with sport hunters for certain "game" species. Such pathetic drivel depicts the true colors of many self-proclaimed

hunter “conservationists” whose justifications for hunting, although never sound, are now being appropriately questioned by a growing number of members of the general public.

For years, hunters boasted that they were merely substituting for the role of natural predators no longer present in many ecosystems. Allegedly, hunting was a management tool to keep prey (read: game) populations in check, and although the argument is fallacious for several reasons, it was tragically persuasive. However, the public is now seeing many hunters in a new light – one that is less favorable because these same individuals are now concerned that the presence and expansion of natural predators such as wolves may impact their recreational pursuits. Today, these “conservationists” are clamoring for the removal or restriction of wolves. Such efforts will undoubtedly backfire, resulting in further erosion of hunter support. If FWP officials elect to cater to the anti-ecological demands of these individuals, they will, despite claims to the contrary, abandon ecological principles of wildlife management to placate a constituency for political, rather than sound scientific, reasons.

Based upon statements throughout the DEIS, it is evident that this is precisely the misguided direction that FWP is heading. Not only is it biologically and ecologically unjustified to even consider opening a hunting season on a predator species only beginning to be restored marginally to its historic range, but for FWP to contemplate opening a hunting season on wolves in order to generate revenue to assist underwriting the cost of management goes beyond the pale and insults the public’s intelligence. (DEIS, p.54) Such a proposal adds substantiation to the growing criticism launched against wildlife agencies. They are essentially nothing more than commercial operations more concerned about supplying recreational targets for a dwindling constituency than meeting the real needs of the more than 90% of wildlife species that are not exploited by hunters, trappers or anglers. Boasting about the restoration of a few token species, such as elk, is a far cry from addressing the serious challenges facing wildlife today.

The limited amount of revenue generated by the sale of a few wolf hunting/trapping licenses will be more than offset by the created need for more law enforcement efforts to regulate another hunting/trapping season and to ensure that opening that season doesn’t open the door to even more illegal killing of wolves than already occurs. Legal hunting/trapping actually provides a degree of cover for illegal hunting/trapping and the limited revenue from the sale of a few additional licenses will not begin to pay for necessary increased enforcement.

Of course, the more fundamental problem with a proposal of this nature is that it perpetuates the problem associated with most state wildlife agencies’ funding schemes – i.e., they have historically and continue to rely on the sale of licenses as a primary source of funding their operating budgets. Not only is this foolhardy given the changing attitudes, values and demographics in today’s society, but it accounts for the abject failure to address the urgent needs of “non-game” and imperiled species. While existing monies must be better spent and the funding base for wildlife agencies expanded, it is also necessary for the decisions made by wildlife officials to genuinely reflect the interests of all wildlife enthusiasts, not just the minority who engage in hunting and/or trapping activities. Is it any wonder that there is a fundamental distrust of state wildlife agencies when the majority of the populace has virtually no voice in wildlife decision-making and its concerns routinely fall on deaf ears?

To make matters worse, state wildlife agencies ignore the huge contribution to wildlife conservation made by the general public who supports and pays for countless wildlife and habitat programs on the hundreds of millions of acres of national park lands, national forests, national refuges and lands administered by the Bureau of Land Management. Rarely, if at all, do agency officials acknowledge the millions of acres of privately owned land where wildlife is preserved (not hunted and killed) and ecosystems are healthy and thriving. Furthermore, more than half of all the excise taxes collected on guns and designated for the wildlife restoration under the Pittman-Robertson Act are derived from the sales of pistols and revolvers – generally not used to hunt. Couple these monies with other examples of revenue sources such as user fees and truly voluntary financial contributions such as non-game tax check-offs, private contributions, etc. and it is startlingly clear that non-hunters do indeed contribute enormously to the preservation and protection of wildlife and wildlife habitat. Yet the typical message echoed by state wildlife officials is that “sportsmen” pay for conservation. This prejudiced attitude tends to reinforce the perception that wildlife agencies are simply extensions of the hunting fraternity, thereby resulting in a crisis of confidence by the general public.

If FWP wants to garner the support of non-hunting wildlife advocates, particularly when it comes to controversial issues such as wolf management, then it must do a better job of incorporating their concerns into the proposals and plans it develops. Simply going through the motions of a public participation process does not fulfill the agency’s obligations. Interestingly, FWP states that it anticipates that the public will readily identify problems or weaknesses of the wolf program (DEIS, p. 75). However, it matters little if officials are unwilling or unable to recognize the inherent bias within the department’s own management philosophy and practices, including its own political posturing, thus dismissing or discounting the legitimate concerns of differing viewpoints. The following is a perfect example of this shortcoming.

The DEIS acknowledges that (1) the relationship between carnivores and other species and the ecosystems in which they live could be the most poorly understood and controversial dimension of carnivore ecology (DEIS, p. 21); (2) there is remarkably limited evidence of the precise nature, degree, and mechanism by which wolves affect ecosystems (DEIS, p.21); (3) pup survival is highly variable and influenced by several factors, including disease, predation and nutrition (DEIS, p. 17); (4) pack territory boundaries and sizes may vary from year to year (DEIS, p. 18); (5) landowner acceptance of wolf presence, and the use of private lands is highly variable in space and time (DEIS, p.18) and (6) packs have been lost to illegal killing by humans, agency control actions where livestock depredation was chronic and for other unknown reasons. Considering the pervasive and ignorant anti-wolf sentiment in some segments of the Montana populace, it stands to reason that once Endangered Species Act (ESA) legal protections for wolves are lifted, intolerant human behavior will increase. Inexplicably, the DEIS fails to analyze comprehensively the implications of the aforementioned information.

In addition to these issues and concerns, a paper published in the April 2003 edition of the journal, *Biological Conservation*, written by Sanjay Pyare of Montana’s Ecosystem Management Research Institute and Joel Berger of the Wildlife Conservation Society questions whether the potential for delisting both wolves and grizzly bears in the near future is ecologically defensible. While the biological recovery goal established by the USFWS is numerical, the ecological system upon which long-term wolf recovery depends is a long way from recovery. These well-respected scientists estimate that as much as 85% of the ecosystem has not recovered. What this may mean for wolves in the future is unknown.

In light of all this information, one would expect the FWP to adopt a precautionary principle of management to the wolves’ advantage. Yet, it appears FWP is poised to adopt strategies that will assuage the concerns of some sport hunters, outfitters and livestock producers at the expense of the interests of wolves. In fact, FWP is so concerned about social values and tolerance that it has failed to adequately consider wolves themselves, independent of their instrumental value or lack thereof to humans. On page 22, the DEIS states: “A simplification about what drives the difference in attitudes towards wolves might be summed up in a few words: the perceived chance of personal benefit or loss resulting from the presence of wolves. Those who perceive they will benefit (either directly or vicariously) tend to favor wolf presence, and those who perceive a threat of personal loss oppose presence.” This purely anthropocentric perspective entirely loses sight of the inherent value of wolves and the entire ecosystems of which they are a part.

Perhaps this failure accounts for the indefensible adoption of 10-15 breeding pairs in the preferred alternative as the arbitrary trigger for different management strategies. Such a strategy is clearly designed to address public opinion and has no biological or ecological basis.

Rather than reiterate all the concerns that we raised in our scoping comments submitted last year about this particular topic and related issues, I have appended a copy of that letter for your review. Most of those concerns have not been addressed in the DEIS. Of particular concern is the failure of the DEIS to comprehensively analyze how human activities impact wolves and wolf habitat and not simply the reverse.

For example, the DEIS should objectively analyze practices such as livestock grazing that directly and indirectly impact wolves and their habitat. Comments in the DEIS leave the mistaken impression that because farming and ranching preserve open spaces, these practices are therefore good for wildlife. On page 59, the DEBE states: "Farming and ranching maintains open spaces that is also habitat for a diversity of wildlife species, including wolves.... There are secondary benefits to a vigorous agricultural industry" However, FWP is well aware that open space, in and of itself, is not necessarily good wildlife habitat.

The public is becoming increasingly aware of how its public lands have been degraded by livestock grazing and by raising of crops to feed livestock. And while ranching apologists insist that agriculture thwarts development, the facts do not bear this out. I would refer FWP to the extensively documented information contained in the recently published book, *Welfare Ranching: The Subsidized Destruction of the West*, edited by George Wuerthner and Mollie Matteson. Moreover, despite the fear mongering frequently used by the livestock industry, it is not an either/or proposition – i.e., either ranching or development. Communities have multiple ways of preserving wildlife habitat from land acquisition through purchase, swaps, negotiation of conservation easements, zoning restrictions, and the list goes on and on.

However, it is important for the public to know that fewer livestock means fewer fences impeding wildlife movements and causing injury and death to wildlife. Fewer livestock means less water will be redirected away from natural flows, thereby improving watershed health. Fewer livestock means fewer perceived conflicts with certain wildlife species, such as wolves. Specifically, the elimination of predator control activities and other "nuisance" animal control, conducted allegedly to benefit ranchers, will help tremendously to restore critical components to the environment, thereby conserving and/or allowing for the restoration of ecological processes – a benchmark goal for all public lands and wildlife agencies. Quite simply, fewer livestock means fewer private domestic animals competing with public wildlife for limited habitat along with fewer acres converted to grow livestock feed crops, and hence even more habitat for wildlife. The DEIS acknowledges that livestock losses appear related to the availability of wild prey (DEIS, p. 33), yet the DEIS offers no discussion about how the presence of livestock displaces wild prey, thereby affecting predator/prey interactions.

In addition, the DEIS should provide a comprehensive cost-benefit analysis of livestock grazing, not merely an economic analysis of how grazing contributes to the economies of local communities, so the public has the information it needs to determine whether so-called lethal wolf "control" actions are fiscally and ecologically warranted. The Fund has made it abundantly clear in previous comments that it is our contention that they are not.

Given that wolves are held in the public trust and they occur on public as well as private lands, such a cost-benefit analysis must examine both the economic and non-economic costs and benefits to general taxpayers (who underwrite all federal public lands including national forests, Bureau of Land Management lands and national refuges (where FWP would be managing wolves if such authority is transferred) by itemizing revenue generated by public lands grazing as well as costs of fence construction and maintenance, water diversion and development (construction of reservoirs, water catchments, pipelines, guzzlers or the placement of troughs or storage tanks), predator and "nuisance" animal control, fire management, drought relief assistance, vegetative conversion projects to correct livestock grazing-induced problems, including prescribed burns, plantings and treatments such as noxious weed control, market price supports, livestock loss/depredation compensation programs and any and all other assistance to ranchers underwritten by tax dollars. In other words, if the DEIS outlines the economic hardships experienced by livestock ranchers caused by wolf predation, it must also describe the benefits these same ranchers receive at taxpayers expense.

While The Fund unalterably opposes the use of lethal predator control actions for livestock protection, any cost-benefit analysis must thoroughly examine both nonlethal and lethal control actions so the public can scrutinize their comparative long-term efficacy and cost-effectiveness. For example, the DEIS must provide information regarding wolf control activities on public and private lands including not only the numbers of wolves killed, but also whether non-target animals were killed, and if so how many and which species, the types of control actions, the names of the grazing permittee or other entities requesting control actions, the number of requests and the costs of control actions. The DEIS must comprehensively analyze both the biological and ecological impacts of nonlethal and lethal predator control and must also analyze a "no lethal predator control" alternative. The public is entitled to this information in order to evaluate control actions in general, and lethal control actions specifically, as means to mitigate financial loss by ranchers.

The cost-benefit analysis must also examine indirect costs of grazing such as how the aforementioned subsidies impact healthy ecosystem functioning, recreational opportunities, etc. For example, how have so-called "improvements" including fences, water developments, cattle guards, etc. beneficially and adversely impacted wildlife (including wolves and their prey), including any changes to behavior, distribution and movement patterns, as well as ecological functioning in general? For example, how does livestock grazing impact threatened, endangered and sensitive species? What costs associated with recovery programs for these species are ultimately attributable to livestock grazing practices? How much food and fiber are actually produced on the lands in question? The DEIS should disclose this information.

Cropping grasses and other vegetation during the growing season is most harmful, particularly if the plant is re-grazed. Wildlife seldom tend to re-graze the same plant because of their mobile behavior. Cows, being less mobile, often re-graze the same plant, causing damage to plants by forcing the plant to replace lost tissue, thereby causing root and seed production to suffer. Additionally, cows tend to be stocked in higher density than you find under natural conditions, further exacerbating the problem. If a drought occurs, such plants are at distinct disadvantage and may die. Most of the concentrated grazing by wild ungulates takes place in the winter when plants are dormant. The DEIS should provide a comprehensive analysis of the differences in grazing behavior between livestock and wild grazers (the primary prey of wolves). Again, such information is critical to an objective assessment of the alternatives in the DEIS.

We are further troubled by the two titles within the Montana statutes that describe the legal status and management framework for wolves. Senate Bill 163 amended several statutes in both titles (DEIS, pp.22), thereby requiring the automatic removal of gray wolves from the state endangered species list when they are removed from the federal list. This legislation also relieves a person from criminal liability for the "taking" of a wolf if the wolf is "attacking, killing, or 'threatening' to kill a person or livestock." (Emphasis added) (DEIS, p. 23) Such license opens the door for anti-wolf prejudice to rear its ugly head. Without strict liability provisions, law enforcement agents will have the unenviable and virtually impossible task of proving that the killing of a wolf was unnecessary.

To compound the problem, the Montana Department of Livestock will "cooperatively" address and "resolve" wolf-livestock conflicts. (DEIS, p.23) The public is well aware and fed up with such cozy cooperation in the management of another species in Montana – Yellowstone bison. If the bison debacle is any indication of how conflicts will be resolved, the public has every reason to be wary of such a partnership. Wildlife agencies should be solely responsible for managing wildlife.

Finally, the DEIS was developed prior to the reclassification of wolves in the Northwest Montana Recovery Area from "endangered" to "threatened." How such down listing will ultimately affect the long-term welfare and recovery of these wolves as well as ensure their role in functionally connecting the subpopulations of wolves in Montana, Idaho, Wyoming and Canada is yet to be seen. Unquestionably, liberalizing management options through down listing will have impacts – the extent of which must be thoroughly assessed before delisting is even considered. This is just one more reason that The Fund supports Alternative 1.

For the aforementioned reasons along with those appended to this comment letter, The Fund supports Alternative I, the "No Action" alternative. We remain convinced that delisting is premature. The long-term recovery and viability of the species depends on much more than just numbers of breeding pairs. Wildlife professionals must in good faith admit this fact and refrain from focusing primarily on numbers as an indicator of recovery and as a centerpiece in management plans. Thank you for the opportunity to comment. We intend to follow this issue closely and request to be notified of any and all developments.

L0242: I am writing to ask that the wolves in Montana NOT be harmed, trapped, snared or hunted. I ask that the wolves in Montana NOT be removed from the Endangered Species Act. I ask that the wolves in Montana be protected. This is crucial. All animals are God's creatures. All animals have both physical and emotional feelings. Animals can feel pain, stress and fear. Your help is greatly needed - now. Please help to save and protect God's creatures and the environment. Laws, rules and regulations should become stronger and be more strictly enforced to better help save and protect all animals and the environment everywhere. Soon. Funding of the state program should be assured before the plan is finalized. Provisions for when citizens are allowed to kill wolves should be clear and specific, permitted only when wolves pose an immediate threat to livestock or people. The minimum number of breeding pairs should be at least 20, as outlined in Alternative 3 of the draft plan, to assure long term survival. Wolves should be managed like other wildlife, such elk, bears and mountain lions, with NO artificial limits on wolf numbers or boundaries. If the wolves begin to over populate, there should be a sterilization used or created in an edible bait type form. Many wildlife become a "problem" due to weather, sprawl, polluters, loggers, development, etc...Sad. Thank you for taking the time to read this letter on this very important issue. I hope that you do receive this letter and in time. Thank you!

L0247: Forgive me for waiting until the last day to comment...spring gardening and wrapping up a school year consume me. I attended the meeting in Whitefish a few weeks back, and was impressed by the quality of the presenters and civility of the attendees. My comment card was such a mess, I had planned to write a nice long letter. Instead here is a quick list:

1) I am comfortable with the concept of the state taking over wolf management, AS LONG AS funding issues have been thoroughly addressed. This still needs federal dollars, because it is a federal priority. 2) I like alternative #3 the best. 3) Hunting could be considered in the future, but not trapping! 4) Hold landowners accountable for "best practice" ranching. 5) Keep management in the hands of the professionals, not the politicians. 6) Consider wolf habitat and prey base a "higher and better use" than human use. Wolves can't go to Safeway when they don't get their elk. Again, thank you for a job well done.

L0249: 1. We don't manage other wildlife species such as elk, lions or bears with artificial upper limits and habitat boundaries, and we shouldn't do so with wolves. Wolves should be able to live anywhere there is suitable habitat, prey base, and minimal conflicts with people. 2. Alternative 2 - would allow for a minimum population of only 10 breeding pair of wolves state-wide. It would also set 15 breeding pair as the point at which management shifts; nothing to do with sound science, and everything to do with political appeasement of anti-wolf groups. The original 1987 Recovery Plan called for 10 BP's in NW MT alone, with additional pairs around the MT portions of Yellowstone and Central Idaho. Under even this relatively weak standard, the minimum number of breeding pairs should be 20. 2. The Plan's commitment to no artificial upper limit must be cast in stone. 4. While we all understand the social and economic concerns must be considered, the fundamental underpinnings of Montana's plan must be based upon the use of "best available science" first and foremost. "FWP identifies population objectives that are based on landowner tolerance, habitat conditions, social factors, and biological considerations" is precisely backwards of the sound management required. 5. Once there are at least 15 breeding pair statewide, lethal removal of problem wolves will be more liberal on public land (our land) and may be the first choice on private land. This is far too quick on the trigger. The dividing line between conservative and flexible management should be 30 breeding pair, not 15. The first option should be to ensure that the rancher is practicing sound animal husbandry and not drawing wolves in with bone yards or improperly tended stock. Next should come on-site aversive conditioning (rubber bullets, cracker shells, guard dogs) Third should be transplanting; last resort should be lethal control. 6. When lethal control becomes necessary, it must in all cases be clearly focused on the offending wolves. The USFWS practice of taking out entire packs must not continue under state management; When there are less than 30 breeding pair, lethal control should virtually never occur. 7. No state plan should be considered complete and acceptable until such funding is available for at least the first 5 years; before FWS can move to delist wolves, they must be able to demonstrate the presence of "adequate regulatory mechanisms." This requires functional, legal, scientifically sound state plans. Without demonstrated funding, these state plans are none of the above. Only a comprehensive Ed and Info system will address this problem, and the \$49,500 budgeted is only enough to address one third of the task, at best. We need more educators, not more scientific reports. 8. Plan says that all hunting and trapping is precluded if there are fewer than 15 bpairs. It should be raised to at least 30 breeding pairs. 9. The implication that sportsmen have to be bribed into doing the ethically right thing by being given a wolf season is insulting. 10. We don't need more token law enforcement here. For at least the first 5 years, fines should begin at \$1000, restitution at \$500, and jail time at 2 weeks. Lawbreakers must know that FWP is serious or wolf poaching will run rampant. 1. Such a series of blank check "licenses to kill" have no place in a state management plan. What wolf hater won't claim (successfully) that a wolf 500 yards away was "close" and "threatening" him, his dog, or his cattle? 12. What should we think of a state plan that allows one of Montana's most important carnivores to protect chickens? Not much. 13. While such programs appear to be valuable with some producers, why aren't rangers expected to carry insurance, like any other business? Why are taxpayers automatically expected to foot the bill? 14. Plan notes a recent scientific peer review of FWS definition of viable wolf population. Despite this, we see no "mortality thresholds" included in the plan which would be themselves trigger more conservative management. Similarly, we see no system of functional, scientifically sound linkage zones between recovery areas, despite the fact that these have now been GIS mapped for a number of species, including the wolf. Such linkages should be fundamental part of the plan. In their absence, few wolves have moved between the 3 recovery areas, despite the fact that such movement is considered vital to long-term viability.

L0251: The Humane Society of the US does not consider the gray wolf to be fully recovered in the northern Rockies region, much less the western DPS as a whole, primarily due to relatively small, isolated populations in this area and insufficient integration into the ecosystem. The attitudes of some citizens in this area continue to be very negative toward wolves. We are concerned that these negative attitudes will continue to pose a threat to the long-term survival of the gray wolf in this area. At minimum, these attitudes could result in a heavy reliance on lethal control to address wolf-livestock conflicts as well as pressure on the state wildlife agencies to allow hunting and trapping of wolves, once federal protections are removed. We suggest that when MFWP does assume responsibility for wolf management, it must do so with the understanding that it is maintaining this species in trust for the nation. Although the preferred alternative (or the additional wolf alternative) may provide some protective measures, we are concerned that these measures may not go far enough to ensure the long-term viability of the wolf. Long term survival of the population will require not simply a particular number of individuals in the population, but enough reproductive adults to account for loss of genetic variability due to chance processes over time, as well as variation potentially lost as a result of disease or weather-related events. While we are not satisfied with the USFWS definition of a pack is sufficient to ensure long term viability (and ecological foundation), the much loose definition of a pack suggested in the DEIS would be absolutely

unjustified and could jeopardize the long-term survival. Mistakenly classifying such a group as a breeding pair, with the assumption that it includes a breeding pair, could jeopardize the survival of the wolf population in Montana. This would be especially problematic if such a classification leads managers to allow for increased hunting and trapping or more liberal methods for dealing with wolf-livestock conflicts. We urge MFWP to adopt a definition of a wolf pack that is more rigorous and biologically relevant than the current USFWS definition. This definition should be retained even after the five year intensive monitoring period. We especially urge MFWP not to revert to an even looser, less biologically appropriate definition of social group. We also do not see any justification for using a particular number of breeding pairs as a trigger for changes in management decisions. Human-wolf conflicts will not necessarily be reduced by reducing wolf population size via recreational harvest or through more liberal predator control. Attempts to reduce the wolf population (through hunting and trapping) to the extent necessary to actually produce a reduction in conflicts will likely put the wolf population once again at severe risk of extirpation. We suggest total MFWP and cooperating agencies rely on public education and assistance with non-lethal means of preventing or reducing conflicts with wolves. Conflicts between wolves and humans can be effectively addressed through non-lethal means (increase wolves' wariness through the use of frightening devices or by killing only the problem wolves. Increasing overall wolf mortality when the state counts breeding pairs may have unintended consequences as well, such as destabilizing pack social structure and territory defense, or increasing the number of dispersing immature wolves. We are concerned that establishing a trigger in terms of the number of breeding pairs, through not intended by MFWP as a population "cap" may essentially function as such. It may inadvertently send a message to the public that only so many wolves can be tolerated, no matter how well the public prepares themselves to prevent any potential problems with wolves. At worst, the management trigger could make it difficult for the gray wolf to truly establish itself and for balance to be restored to the ecosystem. Data from other states indicate that an increase in a wildlife population does not necessarily correlate with an increase in complaints or conflicts associated with that species. We urge MFWP to abandon the use of a particular number of packs as a trigger for changes in management. Instead, MFWP should retain conservative management of wolves (i.e. only minimal human-caused mortality via conflict control activities allowed and no hunting/trapping) regardless of the number of breeding pairs or packs. Wolf recovery depends vitally upon the availability of suitable habitat -- for wolves, large well-distributed refuges are important to maintain sufficient genetic variability. The DIES acknowledges the importance of dispersal, but indicates that no corridors are planned specifically. Therefore the ability of wolves to disperse will absolutely depend upon tolerance by humans, especially if MFWP does not plan to cooperate with other agencies to restrict grazing leases in areas with a high potential for wolf-livestock conflict. We suggest that the importance of dispersal constitutes an important reason not to allow recreational hunting and trapping for wolves now or in the future. We are concerned that hunting/trapping for the wolf may be established or liberalized in the future for the sake of ensuring continued hunting opportunity for hunters interested in hunting elk and other ungulates. Allowing recreational killing of wolves or of predators for this purpose is simply unnecessary and unjustified. If necessary, the number of elk killed by human hunters may have to be reduced. We are also concerned that declines in elk hunter success in the absence of actual elk population declines may be used as justification to allow or increase the recreational killing of wolves. From an animal welfare perspective, designated the wolf as a game animal or furbearer sometime in the future would allow for hunting and trapping methods that many members of the public consider to be inhumane for any animal, including the wolf. HSUS is opposed to the use by the public or by Wildlife Services of leg-hold traps, neck snares, let snares, or other trapping methods that have the potential to result in prolonged suffering and injury. HSUS recognizes the importance of helping livestock producers to safeguard their livestock and to coexist safely with wild predators. However, the goal of reducing livestock depredations does not require the use of liberal lethal wolf control, even when wolf population size is perceived to be large in the area. The use of livestock guarding animals and other non lethal measures should be combined with livestock husbandry improvements in fencing, prompt removal of carcasses, and providing greater protection and supervision of the vulnerable old and very young cattle and sheep. When depredations occur in spite of responsible husbandry and other nonlethal preventative techniques, aversive conditioning and the use of frightening devices can be employed to alter the behavior or depredating wolves. However private citizens engaging in these techniques for the protection of livestock or other property should be properly trained so that they are used effectively and do not cause unnecessary injury or suffering. Widespread nontargeted lethal control or unrestricted hunting/trapping is at best not necessary for the protection of livestock. We are concerned that the DEIS provides only limited information on the nature of the assistance that MFWP or WS will provide producers regarding livestock husbandry improvements and nonlethal predator control methods. HSUS urges MFWP to give greater consideration in the final EIS to nonlethal control methods and use lethal only when all feasible nonlethal control and prevention methods have been exhausted, regardless of the number of breeding pairs. If lethal control is unavoidable, wildlife management professionals are best suited to this task and are more likely than private citizens to target the appropriate individual and to effectively minimize pain and suffering. We ask MFWP to provide more detail in the final EIS on types of assistance -- such as workshops, onsite demos, information on how to purchase and train livestock guarding animals. We also urge MFWP to specify that any lethal control, conducted for the sake of protecting livestock is only conducted when a depredation has been verified and only after all feasible nonlethal techniques have been attempted. HSUS is strongly opposed to the use of chemical toxicants (including sodium cyanide, sodium fluoroacetate) restraining traps, kill traps, denning, aerial gunning and other methods that may result in prolonged suffering. We are particularly opposed to "preventative" lethal wolf control in which wolves would be killed in the absence of verified wolf depredations. It is unreasonable for livestock producers to expect all risk of predation to be removed=moved. This goal could only be reached by killing every wild predator. HSUS agrees that the affected livestock producer should be eligible for compensation at fair market value. We agree that this is an important way to maintain residents tolerance for wolves, at least until more efficient means of nonlethal reduction to risk is more widely used. We urge MFWP to at least establish a temporary wolf depredation compensation fund using state money. Such a fund could expire on a previously determined date under the assumption that other sources of funding will be found in the meantime. This would reassure the public that the state is prepared to take on the responsibility of managing wolves after delisting. We urge MFWP to provide more concrete details on the potential funding for an incentive program and/or proactive program. We appreciate the clarification that a wolf must be "attacking or killing" a domestic dog before a person could legally kill the wolf. However, we are concerned that this distinction between a threat and an actual attack may be difficult to enforce. While we certainly do not want to see dogs killed by wolves or other wildlife, and would understand the desire to attempt to save a dog, owners must be encouraged to take some personal responsibility for the safety of their pets. We understand that the long-term persistence depends on carefully balancing the complex biological social economic, political aspects of wolf management. But we are concerned that a small number of especially vocal members of special interest groups are dominating the "human dimensions" aspects of wolf management strategies in this state. We agree that legitimate concerns about wolf depredation on livestock and the associated economic losses must be addressed. However, an outright opposition to predators by some individuals in Montana has been driven primarily by unwarranted fears and exaggerated claims about the effects of wolves on livestock, human safety, and other wildlife populations. These unfounded claims should not be used to justify recreational hunting or trapping, or liberal lethal wolf control for the sake of protected livestock without first attempting all feasible nonlethal methods.

L0252: Montana Audubon supports a modified alternative 2. The modification we would request in the preferred alternative is to increase the minimum number of breeding pairs of wolves to 20 before liberal management tools are applied. Montana Audubon supports the use of successfully breeding pairs as the population measuring standard for wolves in Montana, versus the use of packs that may or may not be breeding. We also endorse using a minimum breeding pair count, with no maximum count established. We support allowing wolves to be distributed by the interaction of the

species ecological requirements and human tolerance not through artificial delineations. Zoning the state for wolf distribution would be a mistake. We support a minimum level of 20 breeding pairs of wolves before liberal management tools would be implemented. It makes sense to err on the side of conservation of wolves with a higher minimum recovery level established. Montana contains much of the core habitat for the three identified wolf populations centered in Montana, Idaho and Wyoming. Given this fact, maintaining a higher number of breeding pairs in core habitat makes sense. Montana is a big state. Maintaining a minimum of 20 breeding pairs in such a large geographic area is consistent with these goals. Montana, Idaho and Wyoming will not be tied to each other with recovery numbers. A larger number of breeding pairs in Montana would add a safety margin for wolf conservation in the tri-state region. We applaud FWP's commitment to secure funding for wolf management, above and beyond hunting license dollars, including tapping resources outside the state that will support management of this nationally important wildlife species. At a minimum, federal funding sources that could offset cost for wolf management, should be pursued; we are willing to assist FWP in advocating for federal funding. It is important for FWP to actively work with federal and school trust land managers, and private landowners to ensure that practices applied on the ground do not diminish habitat or long-term conservation of wolves. Advocate for special protection for wolf den sites, keeping unroaded areas of the state unroaded, and other similar land management activities. Montana Audubon supports FWP in establishing a compensation program that reimburses livestock producers for confirmed and probable losses due to wolves. Critical to building tolerance amongst ranchers for wolves. We also support program work that emphasizes prevention of conflicts. Providing incentives for ranchers to avoid conflicts will be an important part of this program. Support the development by FWP of an ongoing education outreach program. Scientifically and factually based. FWP is already producing information so that hunters can distinguish between coyotes. Supports the approach to human safety outlined in the preferred alternative.

L0253: In accordance with our belief that uncontrolled wolf populations will reduce big game hunting opportunities and our support for hunting as a multiple use on public lands, we vigorously oppose all of the alternatives, except alternative 4. We feel that there are already too many wolves in Montana. They must be controlled before their numbers get out of hand. It appears that wolf management may become very expensive. MFMU feels that we need to reduce the numbers of wolves in Montana until they reach a level that we can afford to control. Hunting will never work as a means to control wolves. Alternative 5 is not a contingency; it is a capitulation to federal power and a waste of money. MFMU believes alternative 4 would be more palatable to some, even though a declaration of the wolf as a predator or furbearer may actually be more useful to Montana. The primary reason for choosing alternative 2 over 4 is a belief that Montana must comply with federal dictates of USFWS because of the ESA. In order to fulfill its obligation to citizens of Montana and manage wolves for the benefit of Montana, it may be necessary for the state to vigorously defend its wildlife management right both in court and in the media. It may be an expensive and lengthy undertaking. Nevertheless it must be done because the only other option is a complete surrender of the right to manage wildlife to federal bureaucrats. If wolf populations are not aggressively controlled, big game populations will continue to crash and the purchase of hunting license will follow that trend. Before long MTFWP will depend almost entirely on Montana taxpayers for their funding. If wolf populations are not controlled in Montana, and soon, MTFWP will become irrelevant and unnecessary. MFMU completely supports the comments of Montana Shooting Sports Assn. regarding Montana wolf management.

L0254: Animal Protection institute asserts that delisting the gray wolf under the federal Endangered Species Act is premature because wolf populations remain relatively small and isolated, especially when compared to their historic abundance and distribution. API is concerned that state management plans, such as Montana's, will allow sport hunting and trapping of wolves outside of national parks and wilderness lands once federal protection is removed. In addition, we believe the preferred alternative's adaptive management strategy that places emphasis on lethal control to mitigate livestock and ungulate depredation is misguided, unnecessary, and inhumane. The preferred alternative essentially sets an artificial cap on wolf populations. When 15 pairs are achieved, more aggressive management tools may be used under the alternative. We contend the preferred alternative fails to adequately acknowledge the ecological, economic, cultural, and inherent values of wolves. An effective management plan must recognize the critical role wolves play in natural systems, our society's spiritual, psychological, emotional, and historical connections to the species, the remarkable financial benefits of wolf reintroduction has brought to the Northern Rockies, and the rights of wolves to peacefully coexist with people. Finally, we assert that the DEIS fails to meet the basic requirements set forth under the Montana Environmental Policy Act (MEPA) and the MEPA Model Administrative Rules.

Delisting at this time would pull the plug on a species that still requires intensive care. At least two listing factors clearly demonstrate that the wolf remains endangered or threatened throughout a "significant portion of its range". The first is "the present or threatened destruction, modification, or curtailment of its habitat or range". Wolf recovery must incorporate the interrelated goals of conserving genetic resources and maintaining natural systems and biodiversity over a representative portion of the wolf's historic range. A successful wolf restoration plan must:

- Provide continued rigorous protection of wolves, with the recovery across their historic range as the primary goal. Base recovery goals on viable self-sustaining wolf populations without an artificial cap.
- Prohibit recreational or commercial trapping of wolves.
- Prohibit private citizens from killing a wolf unless it poses an immediate threat to human life.
- Place priority on preventing livestock-wolf conflicts. Rather than allowing lethal control of wolves, emphasis should be placed on improved animal husbandry practices that deter wolf conflicts.
- Eliminate and/or reduce grazing of livestock in high-conflict areas that are essential to wolf recovery.
- Prohibit lethal control of wolves ostensibly to conserve or boost elk, deer, and other wildlife populations for hunters.
- Identify funding sources to sustain Defenders of Wildlife's compensation program for livestock losses. It should be noted, however that API believes ranchers should contribute to such a fund. Ranchers should implement non-lethal deterrents to prevent livestock-wolf interactions.
- Improve and facilitate public outreach efforts.
- Encourage wolf restoration on non-federal lands by working with FWS and the conservation and animal protection communities to develop incentives for private landowners.
- Protect critical areas of wolf habitat during key seasons.
- Review, identify, and recommend protections for linkage zones and critical areas of wolf habitat.
- Include a provision for a state wolf management advisory council to continue to identify, discuss and discern management goals, conflict resolution and public education opportunities.
- Identify stronger penalties for illegal killing of wolves.
- Assure funding for state wolf management before the plan is finalized. Funding should not depend upon revenues generated from hunting licenses.

We urge FWP to adopt alternative 1 with our proposed amendments detailed below. Wolves would remain on the endangered species list and enjoy the full protections of the ESA until full recovery of the species in its historic range has been documented and ensured over long term.

FWS would not carry out aggressive management, including lethal control and relocation of wolves, to ostensibly protect or artificially boost prey populations.

Livestock interests and state livestock and wildlife management officials would be required to continue complying with the provisions of the ESA and use cautionary principles to ensure their activities do not undermine wolf recovery efforts.

Wolf managers acknowledge the importance of wolf habitat, including private lands adjacent to federal lands. We contend the following amendments must be adopted to enhance wolf restoration. 1. Both the federal and state governments should encourage private landowners to restore and enhance potential wolf habitat through incentive programs.

2. FWP should improve its public outreach and education efforts to assist landowners with taking steps to avoid conflicts with wolves.

Alternative 2 is fundamentally flawed for the following reasons:

The preferred alternative would allow continued persecution of wolves by reclassifying wolves as “species in need of management”, “Big game,” or “furbearer”. The DEIS fails to make clear what protections would be afforded to wolves under state classification as a “species in need of management” and how these protections differ from those provided under the ESA.

It seems a forgone conclusion that once the veil of federal ESA protection is lifted, Montana will move swiftly toward establishing regulated hunting and trapping of wolves and grant broader latitude to state livestock officials and livestock interest to manage wolves. It makes little sense to abruptly shift management from full protection to regulated “harvest” for a species that is still imperiled. In addition, we are leery of handing over wolf management to Montana, Wyoming, and Idaho because we believe the states’ desire to permit “harvest” of wolves to generate revenue for their respective fish and game departments is driving the decision-making process far more than a commitment to protecting wolves. Dead wolves should not be seen as the cash cow for struggling financially strapped fish and game departments. The preferred alternative suggests that Montana will permit the killing of wolves to conserve or boost populations of “game animals” such as deer, moose, and elk. The preferred alternative’s adaptive management plan promotes lethal wolf control and recreational killing as scientifically defensible management methods, while granting broad discretion to federal and state agencies and private citizens to manage livestock-wolf conflicts and ungulate-wolf interactions.

API strongly opposes an adaptive management plan that allows “liberal” use of lethal control of wolves as the species’ population increase in the state. While we recognize the need for ranchers to safeguard their livestock from predators and the need to protect human safety, the onus should be placed on humans to reduce the possibility of conflicts. The preferred alternative fails to protect habitat corridors, which are vital to allow movement between wolf subpopulations.

The DEIS is required to have a section that summarizes the proposed action including its purpose and benefit. In Chapter 1: Purpose and Need for Action,” the DEIS does not describe the proposed action, and does not describe the purpose of the proposed action and does not describe the benefits of the proposed action. The DEIS only states that without action the USFWS will not delist the gray wolf. Clearly this is not an appropriate explanation of the need for agency action. There is no statement as to why it is problematic for the USFWS to manage wolves in Montana.

The only benefit that the DEIS lists is that managing gray wolves according to state guidelines “will allow the program to be more flexible and adaptable”. However, this statement does not specify how Montana’s management of gray wolf program would be more flexible and adaptable than the USFWS’s management, nor does it go into any detail about why this proposed action is a benefit. The analysis on this topic is merely a paragraph long and is wholly inadequate. There is no description of the proposed action within the purpose and need section. There is no discussion that a substantive change in management would occur under the proposed action. This section of the DEIS implies that the proposed action would merely be a change in management authority. This is a disingenuous portrayal of the proposed action. The proposed action is described in the Preferred alternative section. However, MEPA’s implementing rules, MAR require that the proposed action be described in a section outside of the Preferred Alternative, as a means of providing a summary for the reader. Thus, FWP fails to meet the substantive requirements outlined under MEPA.

MAR requires that the DEIS describe how agencies will share responsibility, or not share responsibility for the proposed action. The DEIS does not fulfill this requirement. The DEIS speaks only of the situation “at present” but does not state how jurisdictional rules will be allocated under the proposed action.

Although it is unclear whether Indian tribes would meet the definition of “state, local or federal agencies” the DEIS must address how Indian tribes’ jurisdiction will be affected by the proposed action. Under USFWS wolf management, Indian tribes have certain jurisdictional rights. The DEIS does not say whether or not Indian tribes will retain this jurisdiction.

The DEIS does not adequately examine the primary, secondary and cumulative economic impacts from the proposed action as required by MAR and MEPA. There is no analysis of the economic impact of the possible loss of revenues from non-hunting outfitters and wildlife viewing. The DEIS also fails to list revenues derived from wildlife watchers. There is a huge disparity between the depth of analysis for hunting revenues and wildlife watching revenues. There is no accounting of the amount of revenue derived from hunting versus wildlife watching, therefore, no conclusions can be drawn regarding the overall financial benefit or detriment to the state.

Furthermore, the extensive information on hunting revenues is irrelevant because there is no analysis on how hunting revenues would be impacted by the proposed action. Every alternative that the DEIS presents keeps the number of wolves lower than under the current USFWS wolf management. This will result in biological and environmental impacts on the ecosystem that have not been analyzed as required by MAR. DEIS fails to state the social, cultural and religious impact of the proposed action. The DEIS alternatives, 2,3 and 5 have such similar characteristics that they do not truly provide alternative plans. The DEIS does not give equal analysis to the alternatives. The DEIS fails to provide the mandatory explanation of the tradeoffs among the alternatives. Although the DEIS contains a section entitled “Preferred Alternative” it does not state the reasons for the preference. The DEIS is required to list the reasons for making this alternative the Preferred Alternative. The DEIS fails to include the mandatory list of source materials used in the preparation of the DEIS. Therefore based on the FWP noncompliance with MEPA and MAR as outlined above, it is clear that FWP has failed to meet the basic requirements set forth under these Acts. Moreover, the FWP has not made a good-faith effort in preparing this document and, as such should be viewed as not legally sound. FWS should reclassify all gray wolves as “endangered”. FWS should designate critical habitat for wolves. Montana’s plan would perpetuate the historic and systematic persecution of wolves.

L0258: 1)I am concerned about the number of wolves that are already here. I think the state of Montana should assume control of the population of wolves. There are dozens of them near our homes at this time. 2)I think wolves should be managed the same regardless of who owns land inhabited by wolves.

L0261: I strongly believe that once wolves are taken off the federal endangered species list within the next two years that Montana should afford these magnificent animals the highest protection possible under state law. Wolves should have no artificial limits or territory and they need to maintain at least 20 breeding pairs.

L0264: We feel the reintroduction of the wolf severely threatens present and future hunting opportunities and would like to see wolves aggressively managed in order to minimize that threat. Concerned about the negative economic impacts which may occur throughout the state should hunting

opportunities be diminished by wolf predation. We should support an alternative which will place management firmly in the hands of Montana FWP. We feel 15 breeding pairs is too many. Our membership is not interested in hunting wolves. Their primary concern is that ungulate populations remain as stable as possible. We support alternative #4 and support the provision that wolf distribution be restricted to areas where the least impact to livestock would occur.

L0265: We support a wolf management plan that protects all wolves on public land. Ranchers need to be able to protect their livestock on their own private lands. Public wild lands exist to promote public wildlife, not domestic livestock. Although ranchers can certainly be compensated for livestock losses encountered within public lands, all wolves staying within national forest, state lands and other public lands should remain alive, wild, free and unmolested. Wolves belong on public wild lands. This plan should include specific provisions promoting retention of wolves into the Whitetail-Haystack-O'Neal road less area in Deerlodge National Forest, the Elkhorn Mountain Wildlife Management Unit, the Electric Peak/Thunderbolt Mountain Road less area in the Helena National Forest and other public wild lands throughout the state. No formal scientific analysis of viability based on genetics and demography has ever been done. It is completely inappropriate to de-list wolves and turn management authority over to states before this vital information is obtained. Wolves exist in less than 2% of their native territories. Two percent is not significant. No further wolves should be killed until these essential studies have been conducted. Long-term viability for genetics concerns alone requires an effective wolf breeding population size of at least 500. Scientists agree that a significant wolf population is essential to retain genetic viability in the face of high mortality due to livestock interactions, illegal poaching and the lack of adequate migration corridors. Address the need for secured and protected migration corridors. None of the alternatives provide for a realistic population of wolves. We currently support the no action alternative, until compliance with the Federal endangered Species Act.

L-269: It is good to know that the wolves are reproducing enough to warrant delisting. Alternative 3 (more wolves) is the best, followed by Alternative 2. Alternative 4 (less wolves) is unsatisfactory because the minimum of ten breeding pairs could be as low as fifty or sixty wolves over a very large area and relisting of the wolf could easily occur. Support your funding efforts and the North Fork Preservation Association wishes you well in getting funding so that alternative five never happens.

L0271: We feel that it is a must to get the wolf delisted for the sake of our farmers, ranchers, and hunters and in general, the safety of all of our citizens. We prefer Alternative #2 with a couple of exceptions and they are to establish a zone for the wolf population and give landowners more flexibility in the Central and Eastern Zones of the State of Montana. Wolves should not be allowed to become established in Central and Eastern Montana. We believe that the administration, delisting language from Alternative #4 should be added to the Central and Eastern Zone in Alternative #2.

L0274: We do not want wolves established in Wheatland County. We feel that we need to protect Wheatland County's #1 resource: agriculture. Wheatland County's resolution #64 expresses our desire to prohibit the presence, introduction, or reintroduction of wolves within the boundaries of Wheatland County. It appears that Alternative #2 is best suited for Wheatland County. We believe that a zone needs to be established for the wolf population, and that landowners in the Central and Eastern Zones need to be given more flexibility.

L0282: Last year and this year you incorrectly stated that outfitters are under the jurisdiction of the Dept. of Commerce. See pg. 2 of present report. Wolf history continues to be very bad on pg. 3. Pg. 6 wolves have never been extinct in Montana. Pg 13 History of wolves in Montana is highly inaccurate. Wolves were present in Glacier National Park many years prior to 1979 and 1986. See Singer 1975. Pg. 14 the number of wolf packs for the Great Bear, Rocky Mountain Front, Bob Marshall and Scapegoat Wilderness areas seems to be extremely low at only two or three. Most of the wolf history from USFWS dates from 1979 with only one from 1975. You should have more in the 1936 -1979 period, which you have basically ignored. Pg. 18 wolves were present before the 1980's in Glacier Park and the Rocky Mountain Front and South West Montana. On pg. 20 you do not mention the possibility of Alaska wolf genetics being present in the YNP area from the first plant of wolves. You do not mention the number of big game animals that will be taken in a year by a certain number of wolves. This is a very important issue in Montana and you have ignored it. Wolf-human encounters are inaccurately reported on pg. 56. Again you only briefly mention rabid wolves and they will probably occur in Montana again in the not too distant future. I cannot stress too strongly that many of the wolf attacks reported could have been human kills had not a suitable weapon been available to kill the wolf or wolves. On pg. 73 you say a regulated harvest of wolves will do many things. Have you looked at Alaska and Canada to see how hard it is to kill the necessary number of wolves to regulate a population? The 72-hr reporting requirement should be kept for wolves and perhaps extended for all species. You wonder why people quit buying hunting licenses. The above is just one more nail in the license coffin. I can remember when we had some common sense and freedom in this state. On pg. 87 you need to re-think the management of predatory species on winter big game ranges. Having invested much effort, money and time in our state wildlife management areas for ungulates we should not let them be ripped apart by too much predation or harassment. Also nowhere in this report have I seen the value of meat produced by wild animals for people in Montana. Having survived for several decades on wild game I see the value of the meat. For many Montana people hunting is more than recreation. Refer to page 124 on State Game Ranges. On page 123 the use of the term breeding pair appears to bias the number of wolves and wolf packs present. You should just try to count wolf packs and even then you will not be counting all the wolves or packs. Also lone wolves and pairs apparently aren't counted. On the top of page 125 common sense has again deserted you. If wolves have to be reduced to lessen ungulate mortality it does not necessarily follow that hunters should suffer also. It appears you want to create a wolf management bureaucracy. We know that we have plenty of bureaucrats in Montana today. They are even more numerous than wolves. Hire the best, experienced ungulate (deer and elk at least) and wolf person you can find to supervise the field program. You already have four or five bear specialist, train them to work with wolves in winter. They can work with wolves at other seasons also. Skip hiring the extra wardens.

L0293: My conscience does not allow me to agree with the reintroduction of wolves in Montana or any of the recovery area. I realize this is not the opinion of everyone therefore, I will try to be somewhat tolerant for the wolf even though I strongly feel they are worthless and will harm future generations of big game animal and never be accepted as a beneficial predator to big game animals by responsible hunters. I don't totally agree with any of the wolf management options but alternative #4 "minimum wolf" is the closest that I could accept at this time. Needs to be modified: Big game animals and their population goals need to have preference over wolf needs. If big game animal populations drop below management goals in a given area where wolves are present, the pack shall either be moved to another area or exterminated. We cannot afford to have wolves hamper the recovery of big game animals. The maximum number of wolves within Montana should be capped at 10 packs with no more than 10 wolves per pack. 15 wolf packs in Montana are too many. Wolf numbers shall include wolves on both private and public land. Wolves are not zoned out of areas east of the continental divide. No sportsman's money can be used for wolf enhancement/recovery. Environmentalist and federal government should be made to foot the bill for wolf management and livestock compensation. Maybe after another five years or more of in-depth study we could see where more wolves could fit in our state, but for now keep population numbers at 10. I strongly feel that hunters should never have to accept reduced hunting

opportunities due to wolf impact. If the big game species numbers start to decline where wolves are present then wolves need have their packs reduced or eliminated. I am strongly against any of my sportsman money being used for the benefit of wolf recovery or compensation for livestock loss. The environmentalist wanted the wolves back in Montana, figure out a way for them to pay for managing wolves. I strongly feel we need to take more time to study the wolves impact and then modify our plan accordingly. But for the present we need to keep the population at a minimum number that will allow them to be removed from the federal listing so we can manage them ourselves.

L0299: We fear that no wolf control guidelines are adopted, we could loose significant number of cattle to predation. FWP must be able to control the number of wolves. Livestock owners or private citizens whose person or property are threatened must be able to kill wolves without threat of prosecution. Animal control officers must be able to quickly kill offending wolves before they kill again. The number of breeding wolves must be kept to a minimum. Cost to manage wolves should come from the federal government and pro-wolf groups, not the state of Montana.

L0300: I am in full agreement of the Fergus County resolution. Threats to our culture and economy have a very menacing potential. I hear testimony from individuals how extremely disruptive a wolf pack can be to a small herd of livestock and game animals. One example is the decimating numbers of the new calf population of the Yellowstone Elk herd of which I am sure you have extensive and reliable knowledge. A wolf pack is not going to recognize a boundary the some well intentioned or maybe not so well intentioned group or individual that has drawn a line on a map. There is not a need to introduce more in the rest of the state. If wolves are introduced in eastern counties it will have a definite impact of land closures, operators getting out of block management contracts, etc. Just general deterioration of public relations with game agencies.

L0315: I strongly support alt. #1, Strongly oppose alts 4 and 5, moderately support alt 3 and reluctantly oppose the preferred alt 2. I strenuously object to turning over de facto control of the wolf population to the likes of state legislators. Those in Idaho and Wyoming are on record I favor of slaughter on sight. Those in Montana differ only in that they have better control over their tongues than their colleagues in Boise and Cheyenne. Therefore I prefer alternative 1, leaving the management of wolves unchanged on the theory that a change to pro-active/somewhat more pro-wolf management could occur at the federal level in 2005 or 2009 before attitudes in MT, ID and WY statehouses turn for the better. Even the preferred alternative allows for killing wolves in self-defense. My fear is that the self-defense story will be used even when a wolf is gunned down at 300 yards. Alternative 2,3 and 4, its hard to argue for or against 10,15,20 or 100? Etc. etc.. Breeding pairs. I would suggest forgetting the numbers until either 1) the Defenders of Wildlife become so overwhelmed with requests for reimbursement that other management measures (i.e.. Killing some excess wolves) need to be considered or that 2) there is verified documentation that wolves are killing deer, elk, moose (or even other species like mountain lions or bears) in such numbers that the herds/populations are showing declines directly attributable to the wolves (and not to weather, hunting pressure, diminished habitat, etc) If significant predation is NOT evident, then perhaps the wolf population should be allowed to increase to 20 breeding pairs (alt 3) or more. Having noted my opposition to any state takeover of wolf management, I would also be opposed to any partial management (alt 5) while the feds are in the litigation which is bound to occur.

L0319: The department agrees that the long-term future of wolves in Montana depends upon carefully balancing the biological, social, economic and political complexities of wolf management. Further, it is also DNRC's view that it is appropriate for FWP to develop a comprehensive management program. The FWP preferred alternative appears unlikely to create appreciable conflicts with our legal mandate to produce revenue for school trust beneficiaries and we support selection of this alternative. The department also acknowledges and concurs that Alternative 5 is reasonable consideration given de-listing uncertainty. The preferred alternative is highly compatible with DNRC's forest management direction to manage for healthy and biological diverse forests and recently adopted Forest Management Rules. In particular, the DNRC supports the FWP's position that since specific habitat corridors, travel restrictions, or area closures were not necessary to restore wolf populations they should not be necessary to conserve and manage a recovered population. The alternative also provides important considerations useful for DNRC's ongoing development efforts for an HCP to address forest management activities on forested school trust lands. With ongoing state budgetary considerations we acknowledge the need to seek considerable funding for long-term monitoring and management need.

L0321: We believe the no action alternative is the best option for wolf recovery for the following reasons. No population viability analysis has ever been prepared for wolves in the Northern Rockies. It is inappropriate to de-list wolves and turn management authority over to the states prior to having this vital information. No analysis of sustainable mortality has been calculated that would be in concert with a population viability analysis. No analysis of migration corridors needed to maintain adequate levels of genetic interchange throughout the region has been prepared. Wolf recovery in the Northern Rockies has been politically driven, without adequate consideration of the best available science, as required by the Endangered Species Act.

L0322: Updated Council version of the wolf plan seems to be the most logical approach. Wolves should be delisted now, as a healthy population exists. Hunting of wolves should be allowed, with changing annual quotas dependent on current populations of wolves, deer, elk, and moose. Manage wolves as mountain lions are managed. Fees collected by the state of Montana for wolf permits/licenses could be used to help pay the cost of annual data collection on wolf, deer, elk, and moose populations. Other costs related to wolf management should be paid by U.S. Fish and Wildlife Service, as it was a federal program, not one requested by the voters of Montana. Livestock owners should be able to protect their livestock before there are losses and should be compensated for losses. There should be authorities (federal and state wildlife people) available in every county that has wolves, so they can respond immediately when there is conflict with wolves.

L0323: Granite County Land Use Planning Council functions as an advisory group to the Granite County Commissioners on issues related to the management of natural resources. The council feels quite strongly that existing populations meet the requirements for recovery, and that wolves should be removed from any Endangered Species Act protections. It is absolutely critical that State of Montana assume the leadership role in management of Gray wolves in Montana. It is imperative that any distinction between public and private lands be eliminated. It has been estimated that nearly 80% of wild ungulates in Montana winter on private lands in addition to domestic livestock. It is important to provide management options for landowners to address issues with wolves that move from preying on wild ungulates to domestic livestock. Additionally, over 90% of Granite County livestock owners utilize grazing permits on public lands. They must have the maximum number of options available for addressing livestock/wolf conflicts as well. During this phase of transition in status of the wolf, it is of utmost importance that management decisions are based in science and reflect biologically correct assessments, and not the whims of those pursuing political agendas.

L0325: Wolves should be given the greatest protection possible and populations allowed to grow until they reach a natural carrying capacity for the state and region. Wolves should not be hunted due to the disruption this will cause to each pack's social structure. MTFWP states that wolves should be managed just like mountain lions and black bears. However, this is not what you are proposing. It appears that you are not going to let wolves grow in

population size until they reach an equilibrium with their environment, which is what lions and bears are being allowed to do throughout the state. Instead you are proposing to keep a minimum of 15 breeding pairs. This is inappropriate. What you mean by managing wolves like bears and lions is that they can be shot and killed. In order for wolves to be managed like other big game in the state they must be allowed to grow to a natural carrying capacity and then strictly regulated to ensure continued population growth. Whether or not wolves affect big game populations they should be encouraged to expand their range into all habitats of Montana. Wolves and other predators are important and vital components to functioning ecosystems. Hunters fear that wolves will cause big game numbers to decline, but this is exactly what many people around the state and MTFWP are managing for, so wolves should be greatly welcomed to expand and potentially reduce big game numbers. There is great opposition to wolves in this state from many citizens, but there is also great acceptance and understanding for wolves by many people in Montana and around the USA. But just because the power is shifted to the states does not mean that you have to bow to the irrational wishes of many vocal opponents of wolves. MTFWP should manage wolves so that they can flourish in number and once again hold their title as a top predator throughout the state where they number into the thousands and contribute migrating individuals across our borders.

L0326: Alternative 2 has 15 breeding pairs, a number that could be accomplished with already identified populations located where they already are. Agriculture is Phillips County's main industry and we are committed to support our citizens whose livelihood is dependent upon this industry. We do not want wolves reestablished in Phillips County. We join our neighboring counties who also oppose reintroduction of wolves. We have passed a resolution declaring the wolf an unacceptable species - a threat to public health, safety, and livelihood. Many our out-of-county and out-of-state visitors come here specifically to hunt which brings additional revenue to our businesses. If the wolf is reintroduced here, the amount of private land open to hunting will decrease. Landowners do not want the wolf. We realize it is critical that we get the wolf de-listed and feel you can do this under alternative 2 with the following amendments. A specific zone established for wolf population. Landowners in the central and eastern zones need more flexibility. If/when the wolf population moves to an area outside the established zone, specific remedies need to be spelled out, Wolves will be trapped and relocated to an acceptable site or destroyed.

L0016: 2) I like Wyoming's proposal. Any wolf outside of National parks or wilderness will be treated as a predator.

L0053: 1) Alternative #3. 2) More education options. No wolf harvest.

L0059: 1) Alternative 2 uses 15 breeding pairs for management over the 10 of feds and gives FWP a better way to manage. State of Montana and others hopefully sportsmen and ranchers will develop compensation program. 2) Make it known that feds should pay their share of the future program. Not just Montana. State of Montana and others - specify others as sportsmen and livestock owners and private property owners.

L0074: 1) None 2) List the wolf as an unmanageable predator.

E6: 1. The minimum wolf alternative is the best of the choices next to eliminating them entirely. 2. Keep a VERY minimal amount (10 or even less) of breeding pairs inside Yellowstone Park and make the wolves unrestricted legal game at ANY time they are found where legal hunting and or shooting is allowed.

E10: 1. I think the proposed 15 breeding pairs is adequate for representation of the species. I support the preferred alternative \2. Have the 15 breeding pair restrained to either Yellowstone or Glacier Parks. If they leave the Parks they could be controlled like any undesirable predator. If wolves left the Park and there was not 15 breeding pair capture the escapes and take them back. If there was more then 15 breeding pair in the parks they could be trapped and destroyed or shot on sight. If you want a complete ecosystem in the parks fine but to turn them loose on the general public is neither right sensible or desired.

E12: 1. Recovery goals should be based on viable self-sustaining populations without an artificial cap. The draft plan is too lenient in allowing the lethal take of wolves simply for threatening to kill livestock or pets-especially on PUBLIC LANDS. The final plan should allow for only non-lethal deterrents in the case of wolves threatening livestock. Lethal control should only be used as a last resort when other methods have been exhausted and failed. Reasonable incentives for citizens working to reduce or avoid conflicts should be considered and adopted. It is important that livestock operators and owners also demonstrate responsible animal husbandry practices including the removal of dead livestock carcasses and avoiding active wolf dens. Include a provision for a state wolf management advisory council to continue to identify discuss and discern management goals conflict resolutions and public EDUCATION opportunities. Begin wolf management training for wolf biologists prior to delisting. Training should prepare biologists for management including radio collaring and monitoring wolves. Stronger penalties for ILLEGAL take of wolves. Identify reasonable and appropriate funding strategies for state management by working with stakeholders. 2. Alternative 1 would be the closest and most appropriate.

E14: 1. I would like to see 15 breeding pairs or less and I would like to see them managed like black bears and mountain lions. 2. My biggest concern is my hound dogs. I know of several hound dogs that have been killed by wolves in Montana and Idaho. Your own statistics show your third largest group of domestic kills are dogs. 108 cattle 220 sheep and 21 dogs. You are saying that it is ok for a rancher to protect his 400.00 calf and his guard dog but I can not protect my hound dogs. Which can be sold for thousands and are irreplaceable to me. I think anyone should be able to protect his dog know matter what kind.

E19: 1. I believe wolves can a nuisance to ranchers but there are alternatives for the wolf and it's existence. One of ideas would be to ask the ranchers to build a good quality fence around there land or pastures where the cattle are. The strong fence would act as a protection. I know it would be a lot of money to actually be able to buy a very good quantity of fence but MAYBE a little government funding could help with the some costs Set up some advertisements to help get funding and donations to help pay for the fences that should hold & protect the ranchers cattle. I'm sure a lot of people out there love wolves and would help with their donations. Then if the wolves at anytime get through the ranchers fences damage or not then the ranchers should have the right to destroy them. I think the Ranchers need to be more self motivated about protecting their cattle. Cows are easy game and the fences are also easy to cross. I would modify the ranchers SELF MOTIVATIONAL SKILLS. 2. Another suggestion would be to take the wolves from birth and raise them like pets like dogs. This would take along time but in the long run maybe wolves wouldn't have to depend on the ranchers cattle to a food source but rely on humans to feed them dog food & water. The first dog ever was just as wild a wolf. Dogs originated from wolves. If the dogs can do it then so can the wolves. In the long run of course. Wolves need a little help to understand and a little civilizational skills that could happen eventually over time and maybe soon they wouldn't be such a big problem.

E20: 1. Eliminate them. 2. They shoot buffalo when they leave Yellowstone Park. Why don't they shoot the wolves?

E21: 1. I am the owner of 50 acres in the North Fork of the Flathead River Valley. I am in favor of the preferred alternative because it provides flexibility to manage wolves over time and keeps control of the management process in Montana. I feel the preferred alternative is balanced and does not favor any one particular group. Thank you for your efforts to resolve these important and contentious issues. 2. I would like to see a better measure of wolf populations than number of breeding pairs. In this respect, I think Wyoming's definition of the number of packs would be a better measure.

E29: 1. I haven't had the time to read through all of the information you have given here but I am writing a paper on Wolf Management and I think what scares me most about taking the wolf OFF the endangered species list is that the public WILL NOT pay attention to the fact that they are still under management and that they will look at it as an OPEN HUNTING SEASON upon the wolf. Wolves were almost eradicated at one time what is there to prevent that from happening again? I am against them being taken off the endangered species list at this time unless it is made clear that there is NOT an OPEN HUNTING SEASON upon them and there will be heavy duty fines and even jail time for those killing wolves without prior permission! If there is a link to this question somewhere in this vast cyber space you have here...please direct me to that link so I may further investigate. 2. Can't answer this at this time. Thanks.

E34: 1. Managing wolves at the state level is a desirable situation and I agree with some of the plan. However I have listed below some vital modifications I feel should be implemented. 2. I applaud the effort to keep the wolves alive and managed however there are some modifications that should be implemented so the wolves do not face unnecessary deaths. Recovery goals should be based on viable self-sustaining populations without an artificial cap. The draft plan is too lenient in allowing the lethal take of wolves simply for threatening to kill livestock or pets - especially on public lands. The final plan should allow for only non-lethal deterrents in the case of wolves threatening livestock. Lethal control should only be used as a last resort when other methods have been exhausted and failed. Reasonable incentives for citizens working to reduce or avoid conflicts should be considered and adopted. It is important that livestock operators and owners also demonstrate responsible animal husbandry practices including the removal of dead livestock carcasses whenever possible treating and removing injured or diseased animals and avoiding active wolf den sites. Include a provision for a state wolf management advisory council to continue to identify discuss and discern management goals conflict resolutions and public education opportunities. Begin wolf management training for wolf biologists prior to delisting. Training should prepare biologists for management including radio collaring and monitoring wolves. Identify stronger penalties for illegal take of wolves. Identify reasonable and appropriate funding strategies for state management by working with stakeholders.

E40: 1. My concern is that there is a piece missing from the whole process. That of a geneticist. The total numbers of animals should NOT be the deciding factor in management strategies, but the numbers of BREEDING PAIRS should be determinative. What is missing is consideration of the size of the gene pool. Can we address this issue? (in Montana you say there are only 16 breeding pairs of wolves). I cite as example, the chimpanzees of the Gombi in Africa. Their gene pool is now isolated in a 30 sq.mile park, and the breeding pairs are decreasing threatening the entire species. The same happens to ground squirrels if more than 50% of the population is killed off and the same is happening to the grizzly as the gene pool decreases and the populations become more and more ISOLATED due to human encroachment on their habitat. Before we make decisions on such an important issue as part of OUR food chain, can we include some genetic information? Perhaps we can discuss a way to live with the other members of our food chain instead of killing them off for our immediate needs? I still find it amazing that someone would actually try to raise llamas or chickens or goats in wolf or bear habitat. Meantime we need more discussion and more reasonable people who do not have agendas of their own. Mostly we need to be inclusive of ALL information which impacts our decision. 2. Add a geneticist to the mix. Thanks for listening.

E42: 1. The Manhattan Wildlife Association a non profit organization of over 1000 members mostly made up of Montana Hunters and Shooters would like to endorse the Montana Shooting Sports Associations position concerning the Wolf EIS. 2. As described in the letter from the Montana Shooting Sports Association. Thank You

E46: 1. Listing wolf as trophy big game animal with seasons and limited draw permits. As seen from other species listed as big game animal in limited draw season framework they provide a significant stream of income (high priced nonresident fees) to manage the resources. And more often than not goes a long way to see that the species thrives and prospers to expand its range to be able increase the permit level and result economic impact for Game and Fish local economies and outfitters. Keep in the game go hunt wolfs. 2. No restrictions on resident / non-resident quotas. Equal chance for everyone no ten percent rule. Squared preference point system (see Nevada G&F) Allow baiting and hound hunting and trapping by permit also. Have a depredation list of hunters for problem wolves licensed with permit of course.

E53: 1. Leave the wolf protected the federal Endangered Species Act. 2. I believe that delisting the wolves and handing their population management over to the state is a death threat and will guarantee their final extirpation: through allowing legal hunting of wolves as a means of lethal control.

E55: 1. Congratulations on your success so far. Deliberations for Scotland will certainly look to you for ideas. In keeping with the modern trend towards nurturing our wildlife rather than only using it I would ask that your plans exclude sport or commercial hunting or trapping as this greatly offends the majority and is a downside of human progress. 2. see above comments

E72: 1. After reading your list of compiled comments the FW&P preferred management plan summary the complete list of Questions and Answers and considering my 50+ years of hunting fishing camping reading etc. I arrived at the following conclusions and attitudes about wolves in Montana: 1) The only way to successfully manage wolves is by direct control of their numbers. Our forefathers and settlers of Montana had it right the first time. They knew that people and agriculture came first and that any management plan that did not recognize these basic facts threatened their existence as viable families and communities. Thus they managed wolf problems with gun powder and steel traps. Sadly many now think that we can set the clock back ignore what history has taught us about wolf behavior and make room for them as if the last 150 years of white man's presence in Montana is of little or no significance. 2) If I am forced to accept the wolf presence in Montana without the bought with blood right to vote on the issue which appears will be the case as our Federal wildlife managers have already done this then I would recommend the following: a) without adequate funding in our State FW & P (we are a poor state you know) leave all costs with the Federals as they started the problem. Let them finish it. To hand this tragic mistake off to the Montana taxpayers and our own respected wildlife managers is just another betrayal. Let them fight over funds for the wolf in Congress at least I have some impact there when I go to the polls to vote. b) if the vocal minority of wolf lovers tree huggers and other misguided animals before people groups want free ranging wolves in Montana then tell them to put their money where their mouths are and pay for the privilege. c) if funding is found (without stealing from our hunting and fishing license funds) to hire and sustain a State wolf management department then let them manage the wolf as a big game animal and a fur bearer. This would bring in considerable revenue and would apply the most efficient form of wolf control known which is

trapping. The wolf pelt makes a pretty good dust catcher on your floor or on your wall. 3) Most Montana citizens highly value the decades of effort and millions of dollars that sportsmen and others have put into building up our game populations and habitat. The very real threat of losing much of these populations to increasing numbers of free ranging wolves with big appetites and killer instincts is a travesty to say the least. 4) Our WMAs are extremely vulnerable to wolf predation. Without them as solid protection for sustaining our big game herds all people of Montana will lose out one way or another. 5) Without quick and deadly control of wolf numbers there will be an across-the-board loss of confidence in our State Big Game Management systems even though they had little or no part in promoting wolf reintroduction. This would likely start a downward spiral of big game hunter support and a marked decrease of sales of hunting licenses. 6) An earlier comment to FW&P said Manage people and not wolves. That is the root attitude (based on feeling and not common sense or experience) of persons who have put the interests of the wolf ahead of human welfare. In effect they desire to change the Face of Montana at the expense of our big game herds and those that support them year in & year out. So far they are winning! They have managed to dump an unwanted wolf problem into our back yards and now they want to force us to live with it under their choice of rules. The best interests of the Montana citizen or our game herds has nothing to do with their emotional drive and zeal to see this gut ripping ham stringing carnivore living a protected existence in Montana. It is no wonder that many are willing to utilize the Three S system of wolf management Shoot Shovel and Shut Up. 2. I apologize for not following the instructions on this page and answering the questions. I could not find the five alternative Plans on your web site so could not address them. Please excuse my poor spelling. My Spell Checker does not work on this document. I realize that Montana would be better off if our FW&P had control of the wolf population and were left alone to manage them as big game animals. I doubt that this will happen because of all the adverse publicity and political pressures brought on by the emotional and misguided wolf lovers. Most of these pressure groups are from out of state and we seem to have lost our resolve in State politics to stand up to their foolish game management ideas and do what is best for our citizens and our game populations. For example our State level leadership was not strong enough to stand up to the same pressure groups that forced our FW&P to go belly up in regards the public hunting of Buffalo and Grizzly Bear. What a slap in the face to the Montana big game hunter and the FW&P! Will we continue to let these animal lovers push us around or will our leadership learn to stand its ground and speak the truth about wise game management? Thank you for the opportunity to make this comment. You have my permission to reprint it for comment purposes.

E79: 1. FWP preferred alternative. Big game hunting in Montana is an important economic asset for our state. The wolf population is a heavy determining factor on game numbers and hunter success. FWP is the best equipped agency to determine the best wolf/game balance. 2. I would like to have the fewest wolf packs possible for the benefit of the game population. After all there is a very good reason the wolf was eliminated in the past.

E80: 1. My wife and I have visited Montana and the Greater Yellowstone area 6 times in the past 12 years and intend to return. Much of our interest has centered around the abundant wildlife; wolf reintroduction has been a big part of that interest. The research that we have seen so far strongly supports the position that wolves are a keystone species in the area and that the ecosystem (not to mention the economy of Montana) is much healthier as a result. As such we urge you to keep this in mind as you consider delisting the wolf. While we would prefer not to be tied to a specific alternative we wish to suggest the following points. 1) The program's funding needs to be assured before delisting is considered. 2) There needs to be clear guidelines on when and under what conditions wolves can be killed. 3) Since so few cattle are actually killed by wolves we recommend that Montana pay for such losses. While this may sound unwise consider that much of the recent increased interest in Montana is driven by the excitement of wolves being reintroduced. I strongly suggest that the value wolves have for your economy strongly outweighs any reimbursement cost for lost livestock 4) Wolves should be managed as you manage other wildlife. That is there should be no artificial limits put on wolf populations. Rather they should be allowed to fluctuate in tune with the environment. Thank you for the opportunity to comment on the wolf recovery EIS. We urge you to do what is right for the ecosystem wolves and Montana's economy and not what may serve the short sighted goals of some entrenched interests. I can assure you that our interest in Montana will be greatly diminished if wolves are not allowed a place in Montana's ecology. 2. see my comments above

E86: 1. 2. After sitting in on a couple of public meetings I gathered that many local folks felt that 15 breeding pairs were too many (their words) and 10 pairs were too close to the baseline for delisting...perhaps 12 or 13 breeding pairs for this alternative would be more acceptable to the general public. 2. have a hunting season with minimum wolf plan.

E89: 1. I as an outsider in NJ who respects nature and people hope you will find a way to promote wolves to breed and live in safely in Montana despite the need to protect farmers residents hunters etc. 2. I would modify the number of hunting permits and quota of wolves killed to reflect a balance and not just a random upper limit.

E95: 1. Hello. I just finished reading the five alternatives and must say that while I think the Updated Council/preferred alternative is better than three of the others I don't believe it is adequate. At this point I prefer the No Action alternative. Here are my concerns: I like a lot of Americans are not satisfied that the U.S. Fish & Wildlife Service has yet to meet the legal requirements of the ESA for wolf recovery. I believe until those legal requirements are met (rather than sweeping them under the rug as though they don't exist) Montana should take no action. The No Action alternative is my recommendation. Wolves would remain on the endangered species list and the U.S. Fish and Wildlife Service would continue to manage wolves in Montana. The Updated Council/preferred alternative is lacking in several areas. One major area is that it will use a benchmark of 15 breeding pairs to determine wolf management techniques. That is entirely too low to assure that even minimum viability will be possible over the long term. Science informs us so why not use it in drafting this plan? There is strong biological evidence that any population under 50 members likely faces extinction. So how in the world can we justify setting a benchmark of 30 animals? Especially when you don't provide for any assurances that those 15 breeding pairs will have genetic diversity or means to move from one pack to another for genetic interchange. If somehow or another we should get to the place where this benchmark is called upon and we have only 15 breeding pairs spread out around the state we can be almost assured that the wolf population won't be of minimum viability. Look at how many wolves have been legally killed just this year alone! You can see that it would take very little time to wipe out the last remaining 30 wolves. I realize that 15 breeding pairs is your minimum but several things in the DEIS lead me to believe that it is not out of the realm of possibility that we could quickly find ourselves at that bare minimum. In order for wolves to maintain genetic diversity and to account for loss due to death -- natural deaths as well as death by hunting livestock interactions illegal killing automobiles or other unintentional human caused deaths and struggles due to unsuitable or fragmented habitat -- having a significant number of wolves is essential. The benchmark numbers and recovery numbers in the preferred alternative are dramatically too low and there is no indication anywhere in the draft that Montana FWP has based anything on scientific evidence. It appears that 15 breeding pairs is mostly an arbitrary number as are the numbers in the other alternatives. It is not clear to me from reading the plan how Montana will be able to ensure that wolves will remain a recovered species. The benchmark for minimum numbers is entirely too low. In addition the plan doesn't call for sufficient education measures for Montana citizens and the results will be that wolves will continue to be killed illegally and in some of the legal cases unnecessarily. There must be more education planned in order to minimize illegal wolf kills. Wolves need to disperse from one pack and join with other dispersers to create new packs. The long-term survival of the species requires this genetic interchange. But without education humans will continue to make that difficult if not impossible. Montana has county governments passing resolutions that wolves will

not be allowed in their counties. It is highly likely that many dispersing wolves will be shot on sight and evidence of their messing with my livestock will come later. The Montana DEIS also plans to manage wolves by removing them from certain areas when FWP thinks it is necessary. In all likelihood that removal will be followed by new wolves moving into the same area because it is favorable wolf habitat. There is nothing in the Montana DEIS to address this problem. Hunting has great potential to cause additional wolf deaths besides just the trophy wolf. After hours of observations of wolves in the wild I can tell you that the death of one alpha wolf has repercussions throughout the pack. In some cases those repercussions will mean that other pack members will also die. The DEIS says that wolves will be managed much like mountain lions and bears but the wolf's social order makes it an entirely different animal and the DEIS does not address that fact. I don't believe that the preferred alternative protects the wolf nor do I believe it is strong enough to ensure that wolves will thrive in Montana for future generations. Despite what the plan intimates the facts are that the current wolf population in Montana is not currently at a recovered size. Given that plus the fact that the requirements of the ESA for wolf recovery have not yet been met I believe that wolves should remain on the endangered species list under U.S. Fish & Wildlife Service management. Please adopt the No Action alternative.

2. My first choice is the No Action alternative and I wouldn't modify anything about it. Please see above for my comments about your preferred alternative.

E97: 1. Like Defenders of Wildlife and the Alliance for the Wild Rockies I support and urge you to enlist the no action alternative for Montana. There isn't substantial scientific evidence to support the call for delisting. While wolves may have met federal "recovery goals" they fail to represent a recovered population considering studies show that thousands of wolves are needed to ensure genetic viability. The current population of little over 700 wolves in Montana does not promote genetic viability. Also in reference to ESA's requirement of a population regaining a "significant" amount of its historic territory wolves exist in less than 10% of their historic territories and this cannot be labeled as significant. Furthermore scientific evaluations of what percentage distribution would be seen as significant have yet to be conducted. In addition no population viability analysis based on genetics and demography was ever conducted in the Northern Rockies. No analyses of sustainable mortality or migration corridors have been prepared. Lacking this and other studies is the sole basis for the argument aimed at halting the wolf reclassification. Wolf recovery has been politically dominated and driven without the consultation of the best available science as obligated by the Endangered Species Act. This premise is what infuriates wolf supporters. Organizations such as Defenders of Wildlife have taken legal measures to prevent the delisting of the gray wolf. Rodger Schlickeinsen president of Defenders of Wildlife emphasizes "It saddens us to have to have to take this step when we've made such a tremendous start toward real sustainable wolf recovery. But by backing away from wolf protection before the job is finished Secretary Norton is endangering everything her agency has achieved so far". (Defenders of Wildlife Press Release 4/1/03) However delisting proponents insist that recovery has been substantial. In response to Defenders of Wildlife Todd O'Hair – Gov. Judy Martz's (MT) natural resource advisor – proclaims that "Defenders of Wildlife ought to be celebrating" due to the fact that since '95 and '96 - when three dozen animals were reintroduced in Yellowstone and central Idaho - numbers have rocketed to over 700 animals in the state. (McMillion) Others on the side of the federal government believe that the FWS has done its job to facilitate recovery et groups such as Defenders of Wildlife and Alliance for the Wild Rockies persist with their convictions that delisting isn't supported by adequate science required by law. Despite wolves having some legal protections in Montana Idaho and Wyoming after delisting if they roam into Washington Oregon Nevada California or northern Utah or Colorado they then have no federal protections. Furthermore the Defenders of Wildlife point out that the FWS is exclaiming that wolves are currently "recovered" across their vast stretch of historic range yet the FWS hasn't made any progress in recovering species in these areas. For example only three of nine northwest states that have vast historic habitat available within the Northwest Population Segment have made recovery efforts (MT ID and WY). Also the organization underscores the faulty DPS designations. The FWS's designations of Distinct Population Segments "were not created based on science or to promote wolf recovery but rather were developed simply to clear the way for the Service to move as quickly as possible to the elimination of all ESA protections for wolves in the coterminous United States". 2. Subsequently would insist upon the no action alternative for the Montana Wolf Plan EIS. The listing of wolves under the ESA should remain classified as endangered and the management responsibilities should be left to the USFWS. Whether the benchmark number of 15 breeding pairs in Montana needs to be maintained or increased is of less importance than the dire need for complete scientific analysis of all the discussed factors. Significant scientific data is essential for determining the actual status of the wolf's presence and future in the United States and even more so for establishing reason for reclassification much less delisting

Wolf Numbers

Summary of Comments: Some comments question the need to establish a benchmark number of breeding pairs for adaptive management at all. Other comments pinpoint the specific wolf numbers used in the alternatives (especially 2 and 3) – saying that these are either too low, too high, seemed arbitrary, or had no scientific basis. Some comments mistakenly interpret the benchmark as a population cap and say that the wolf population in Montana should not be capped at that level. Other comments want the wolf population to increase indefinitely without management constraint, whereas other comments say that the wolf population should be limited at the lowest level possible if it couldn't be eliminated altogether. Closely related comments conclude that the population is already too high. Some comments question USFWS's assessment of wolf population viability in the northern Rockies relative to the recovery goal.

Response: USFWS determined that the wolf population in the northern Rockies would be biologically recovered when a total of 30 breeding pairs by the recovery definition is reached for three years in a row. USFWS's determination of the recovery goals and the long term viability of the wolf population received independent, scientific peer review and were determined to be adequate. Changing the recovery goal or revisiting the viability determination is beyond the scope of FWP authority and the draft EIS. Nonetheless, the federally required 30 total breeding pairs could be equitably divided by the three states which will be required to maintain the recovered population. Montana, Idaho, and Wyoming have each committed to maintaining a third of the required total number of breeding pairs since the federal recovery lines crossing state boundaries dissolve upon delisting. Each state would then manage the wolves within their respective state boundaries.

The No Action alternative is the continuation of the federal recovery program. Wolf numbers in that alternative are as per recovery criteria established in the original wolf recovery plan and projections published in the Yellowstone Reintroduction EIS. The number of wolf pairs in the Minimum Wolf Alternative is based on the premise that Montana would maintain its minimum commitment (or 10 breeding pairs) to the tri-state total of 30. The 15 breeding pairs in the Updated Council Alternative is based on the recommendations of the Interagency Technical Committee that served the Montana Wolf Management Advisory Council during its deliberations. The Technical Committee also consulted with other wolf experts. Their recommendation was based on the premise that 15 breeding pairs would be a minimum for a viable population that would still allow management flexibility and implementation of most tools being considered by the Council. FWP, in response to public comment, wanted to include and analyze an alternative that called for “more” wolves and choose to present one with 20 breeding pairs as the adaptive management benchmark. FWP arbitrarily selected 20, but could’ve just as easily analyzed 17, 25 or 100. A total of 20 pairs was five more than the preferred alternative and twice as many as the Minimum Wolf Alternative.

FWP clarifies that the benchmark of 15 breeding pairs in the preferred alternative does not function as a population “cap” in that the population would be limited to being only 15 breeding pairs in size. The benchmark serves as a signal to managers that an adjustment in management decisions should be made, either in the more liberal or conservative direction. A more objective basis for decision-making is established by using a benchmark signal. The impacts analysis of this alternative indicates that there would be more than 15 breeding pairs present in Montana in 2015 if all the predictive assumptions are valid and the population performs as FWP assumed it would in response to implementation of the specific conservation and management tools. In its preferred alternative, FWP is trying to build a program that maintains a viable wolf population that is biologically possible for wolves and their prey base, socially acceptable to a wide variety of stakeholders, and economically feasible for the agency to implement. Managing wolf numbers is an important facet of that goal.

Representative Comments

W72: Can we manage them at total wolf numbers? Some kind of consideration given to total numbers in addition to number of pairs.

W73: As a hunter, I am concerned about the total number of mouths. I like wolves, but if it impacts my hunting, something needs to be done.

W104: I prefer alternative #3. Setting a benchmark of 20 is going to allow us to keep them off the list (more flexible).

W148: Benchmark is artificial and why limit ourselves?

W177: I am uncertain about the arbitrary 15.

W194: I like #4 because it limits breeding pairs to 10 pairs. I think livestock producers should be compensated for losses, but not by hunting license dollars. Should be compensated by feds. Don’t want to feed wildlife to wolves. Hunting dollars paid for the wildlife. Hunters should harvest the excess wolves to manage wolves in an area.

W200: Benchmark seems more like a limit. I question if hunting wolves is necessary in general. I think wolf numbers will be controlled enough through depredation actions.

W221: With alternative 4, we’ll have to put with so many wolves. If they drop below a certain number, we loose control. I prefer alternative 2 so we don’t have to worry about backsliding from the threshold.

W231: Breeding pair numbers are irrelevant. We’ll be so far over those thresholds so quickly that they’re meaningless.

W316: Sufficient wolves to avoid relisting.

W336: How come 35 packs and only 16 breeding pairs?

W370: Guard against numbers getting too low or we get federal control.

W374: Not good to keep number of pairs at 10 because it limits ability to eliminate problem packs. Trade-off is more wolves. W502: As a farmer/rancher, the only good wolf is a dead wolf. When they go beyond federal land, the rancher should have the right to shoot or trap them. Fifteen pairs x 5 = 75 wolves: in a couple of years, the population can multiply really fast.

W514: Likes Alternative #2, but would like to see a higher number of breeding pairs, but 15 pairs is more socially acceptable.

W555: I support alternative, but set the breeding pairs at 12.

W574: Alternative #2 modified to bring benchmark down to 10 pairs.

W598: I am concerned that Alternative #2 has no upper limit.

W750: I would like to see the breeding pair numbers increased by a factor of 5 for each of the alternatives to maintain a healthy population.

W1018: Wolves are one more predator on top of what we have; less wolves are better.

W1098: Could there be a bounty someday? Current wolf numbers are out of control.

W1166: No cap on the number of packs.

W1182: A cap on the number of wolves is necessary.

W1317: If management goes to 20 breeding pairs, does this allow Idaho or Wyoming to go below 10?

W1435: 15 breeding pairs is cutting it close. Could have a disaster impact the population. Would prefer a minimum of 20 breeding pairs.

W1467: I would like to see the wolf population managed at a low level.

W1: The more wolves we have, the less deer and elk we will have.

W1462: Provide scientific justification for the numbers of breeding pairs allowed (e.g. population viability analysis PVA).

W13: Alternative #2 – but how many wolves do we actually need?

W32: 1. Alternative 2 with revision – 15 packs are about 3 too many – we have packs now that simply cannot stay out of trouble, so need to reduce to about 12. 2. Change to 12 packs, need funding assistance from other sources than the state. Livestock owners need more flexibility in taking emergency action when animals threatened.

W63: 1. Alternative #1. Local feelings are unfriendly to wolves. All other plans have breeding pair limits that are much too low. Depart. of Livestock has an adequate compensation system. I totally oppose hunting wolves, as well as bears and mountain lions. Why waste scarce state funds when we can rely on federal dollars? 2. Nothing. More action is needed at the federal level.

W69: 1) Alternative #1, No Action. Do not delist. The wolf is not sufficiently recovered to begin managing them as a furbearing game animal. Funding, private and state funding a possibility in combination with federal funds, especially for education. 2) Revisit the issue in a few decades. Defenders of Wildlife continue compensation program.

W71: 1) Alternative #1 comes closest for me. 2) I don't think there should be arbitrary numbers set for breeding pairs. The carrying capacity of the land should dictate. The plan should be adjusted as populations are studied and hopefully grow. No habitat boundaries should be established.

W84: 1) Alternative #3. 2). Need some kind of compensation program. Biggest concern is an artificial number set upon wolf population. I fear that as soon as 20 or 15 pairs is met, it will be considered too high or a problem whether it is a problem or not. Flexibility with wolf numbers is key.

W85: 1) Alternative #5 while we wait for all states to develop plans. Increased local involvement. 2) Avoid the "benchmark" number of 15 and instead manage wolf population using numbers and pack numbers, in such a way to minimize local effects on ranging livestock and game populations.

W112: Alternative #4. Less numbers, less problems. No state funds.

L0136: 1) Minimum wolf because I feel that any additional packs of predators would severely deplete game herds as well as giving government agencies the excuse to close more land. 2) I would tell the USFWS to butt out of Montana's affairs. Also public hunting and fishing license fees should not be used to fund any part of the wolf program.

L0107: 1) #4. The fewer, the better, try to keep them in the west, we don't need them statewide. 2) Help protect the ranchers of western Montana and also ranchers across Montana. Special tags to hunt a few in Montana

L0036: Of the alternatives presented, only "No Action" appears to satisfy the basic legal and biological requirements of the Endangered Species Act. Any action alternative should, in my mind, adopt the principles of sound conservation biology. FWP should not adopt a wolf conservation and management program until these minimum standards have been met. Until that time, wolves should remain on the endangered species list and the U.S. Fish and Wildlife Service should continue to manage wolves in Montana. A benchmark of 15 pairs, 20 breeding pairs, or 10 breeding pairs in Montana each fail to achieve minimum viable population levels. Neither will an agreement with federal authorities to employ the Advisory Council's recommendations to manage wolves and resolve wolf-related conflicts achieve viable population levels. Wolves may have met federal "recovery goals", however these goals do not accurately represent a recovered population. USFWS has not conducted a population viability study based on scientific evidence. The arbitrary "15 pack" level proposed in the preferred alternative is simply a number that has been assigned and has not been tested and proven to produce a viable wolf population. Wolves exist in 10% of their native range. Scientific studies must be conducted to determine what level of occupation and distribution of their native territories constitutes "significant" distribution levels. These studies have not yet been conducted. The scientific literature on long-term viability for genetic concerns alone requires an effective breeding population size of at least 500, which translates into total population size in the thousands. No sustainable mortality level has been calculated. And no analysis of migration corridors needed to maintain adequate levels of genetic interchange throughout the region has been prepared. To date, wolf recovery and management in the Northern Rockies has been politically driven. Until there is an adequate consideration of the best available science, as required by the Endangered Species Act, the No Action Alternative is the only option that satisfies the minimum biological and legal requirements of the Act.

L0146: 1) Alternative 1. Twelve to fifteen breeding pairs statewide is a ridiculously small number for a state the size of Montana. The ranching industry is being given too much consideration - livestock losses - within limits are an acceptable price to pay for a healthy predator population, statewide. 2) As wolf populations increase and require controls, I advocate rifle hunting only. No trapping should be allowed. Bring wolves back to the Missouri Breaks in the new National movement.

L0169: 1) Alternative #1. 2) Wolves have not recovered to the point where they can be managed under any of the other plans.

L0276: There should be NO WOLVES in Fergus County and I support [Resolution No. 6-2003]. There should be a minimum number of breeding packs. They must be located in National Parks, not on any Forest Service or BLM-managed land used for livestock grazing because these animals cannot exist together without causing problems. The wolves would have to be closely monitored to keep their numbers under control to meet their food supply in the National Parks. If they should stray from their immediate area, they should be trapped and returned or sent to a zoo where they can be seen by people who think they are important. There should not be any wolves allowed to exist in Central or Eastern Montana. To prevent their movement here, we need a mandate that they be shot on sight with a \$1000 bounty.

L0238: Please accept these comments on behalf of the board and over 800 member families of the Kettle Range Conservation Group who live, work and/or recreate in the Columbia River Basin. Our mission is to defend wilderness, protect biodiversity, and restore ecosystems of the Columbia River Basin.

We are concerned that taking Montana wolves off the Endangered Species List would be a regressive move that will further endanger the state's small wolf population, threaten the genetic integrity of nearby metapopulations in Idaho and Wyoming, and set a negative precedence for science-based wolf recovery efforts in other states.

We agree with and sign-on to the following comments submitted by the Alliance for the Wild Rockies:

Upon review of the five alternatives in the Draft EIS, Alliance for the Wild Rockies supports the No Action Alternative, (no delisting or state management at this time). Wolves would remain on the endangered species list and the U.S. Fish and Wildlife Service would continue to manage wolves in the state of Montana until the legal requirements for recovery under the Endangered Species Act (ESA) are satisfied.

The Endangered Species Act

The Endangered Species Act (16 U.S.C. § 1531 et seq.) provides for the "conservation of the ecosystems upon which threatened and endangered species depend." "Conservation" means the use of all methods and procedures needed to bring the species to the point at which listing under the Act is no longer necessary. The U.S. Fish & Wildlife Service is required as a matter of law to develop plans to maintain and restore wolves in order to ensure their survival, recovery and eventual delisting under the ESA. The designation of an adequate area of habitat is inextricably linked with the recovery planning process. All aspects of the ESA recovery process must be guided by the best available scientific information.

Recovery Plans

50 C.F.R. 402.02, as noted in Fund For Animals, provides that the Recovery Plan is a "basic road map to recovery, i.e. the process that stops or reverses the decline of a species and neutralizes threats to its existence." The Recovery Plan is intended to provide a means for achieving the species' long term survival in nature." Fund for Animals v. Babbitt, 903 F. Supp 96, 103 (D. D.C.1995).

The Recovery Plan shall, "to the maximum extent practicable" incorporate: (1) site-specific management action; and (2) objective, measurable criteria by which to monitor recovery. 16 U.S.C § 1533(f). Site specific actions shall include those actions the agency finds "necessary to achieve the plan's goals for the conservation and survival of the species." 16 U.S.C. § 1533(f)(1)(B)(i). The RP need not be exhaustively detailed, when the Service has recommended protective actions or explained why "impractical" to do so, it has met its burden. Fund For Animals, at 107, 110.

Because the same five statutory factors must be considered in delisting as in listing, the Service must address each of the factors that led to the original listing in designing the "objective measurable criteria" for the recovery plan. Fund for Animals, at 111; 16 U.S.C §1533 (a), (b), (c).

It is our position that in regards to wolves, the U.S. Fish & Wildlife Service has not satisfied the legal requirements of the ESA. Therefore, removal of ESA protections from wolves and abdication of management authority to the State of Montana is inappropriate and premature until such time as recovery as per the legal requirements of the ESA has been achieved.

The number of wolves represented in the remaining alternatives is arbitrary and based on politics and not sound science. The Wolf Reintroduction DEIS and FEIS (U.S. Fish & Wildlife service 1993; 1994) stated that the recovery goals would provide for "minimum viability." However, no formal peer reviewed scientific analysis of viability based on genetics and demography has ever been done to support these goals. A key determinant is not just the total population size (N), but also the effective breeding population size (Ne). The draft EIS alternatives provide for just 10-20 breeding pairs. Extinction risks become severe whenever breeding populations drop below 50 (Shaffer and Samson 1985) and if these numbers become too small, the population can enter into an irreversible decline or "extinction vortex" (Gilpin and Soule 1986).

Classically, Ne has been set at 500 (Franklin 1980). However, Lynch and Lande (1998) suggest minimum Ne should be closer to 5000 while Franklin and Frankham (1998) suggest minimum Ne need not be larger than about 1000. While accepting the legitimacy of this debate, we believe that Ne = 500 is conservative and appropriate in this instance, since the current state of knowledge regarding wolf population viability does not allow for pinpoint precision. Thus, Ne = 500 provides a reasonable management goal at this time. The Montana Wolf Management DEIS alternatives outlines wolf numbers ranging from 10-20 breeding pairs. This equates to an Ne of just 20-40, a small fraction of the minimum Ne of 500 needed to prevent significant population declines associated with the "extinction vortex".

Wolf populations exhibit major fluctuations depending on the availability of food sources and suitable habitat. Frankham (1995) found that the instability of populations result in lower Ne:N. In assessing Ne:N ratios for conservation purposes, Nunney & Campbell (1993) suggested total N should be 5-10 times the value for Ne. With portions of the Idaho and Wyoming recovery zones overlapping into the state of Montana, Montana should be expected to provide 1/3 to 1/2 of all the wolves in the northwest. At a minimum Ne of 500, Montana's share of an effective breeding population for long-term demographic and genetic viability should be in the range of 165-250, or approximately 83-125 breeding pairs, compared to the 10-20 breeding pairs the alternatives offer. At average pack sizes of 5-7 in the Northwest Montana Recovery Area (USFWS et al. 2001), Montana would need to contain approximately 415-875 wolves, compared to the 183 confirmed at the end of 2002. This is not an unreasonable goal considering there are 1,500 wolves in northern Minnesota, an area with far less public lands, wilderness and national parks than Montana. Having a significant number of wolves is essential to retain genetic viability in the face of high mortality due to wolf/livestock interactions and the lack of contiguous habitat.

The recovery goal figures do not accurately represent a recovered population. The above studies have shown that thousands of individuals are required to have genetic viability, not hundreds. USFWS has not conducted a population viability study based on scientific evidence. The arbitrary "10-20 breeding pair" level is simply a number that has been assigned and has not been tested and proven to be a viable level. The science is not there to prove this.

Habitat area is uncertain and unprotected. Wolves in the Northern Rockies exist as a metapopulation consisting of three core areas. However, current U.S. Fish & Wildlife Service recovery policy direction fails to establish effective habitat linkages between these three core areas.

Therefore, without linkages, the benefits of metapopulations decrease dramatically due to lower rates of genetic interchange. These populations must have suitable, protected habitat areas in which to survive. Currently wolves only exist in 2% of their native territory in the United States. In Montana, livestock receives far more protection on public and private lands than wildlife.

Some scientific investigators have suggested the appropriate scale for capturing broader environmental phenomena may be 10-15 and as much as 50-100 times the size of the largest disturbance patch (Shugart & West 1981). In the Northern Rockies, wildfires burned $\approx 10,460$ km² in 1988 (National Interagency Fire Center). Using this as the size of the largest disturbance patch, a minimum dynamic area (Pickett & Thompson 1978) in the U.S. Northern Rockies may be $\approx 104,606$ -156,909 km², and possibly even $> 500,000$ km². As a top level predator that is wide-ranging, it is reasonable to conclude that wolves will need a protected habitat area consistent with an area of this size.

The size does count when designing effective reserve networks. For example, larger reserves are known to hold more species, better support wide-ranging species such as grizzly bears, and have lower extinction rates than smaller reserves (Meffe & Carroll 1994). In a review of western national parks, (Bekele 1980, cited in Harris 1984) found the two largest (Yellowstone and Glacier) had retained a greater number of large mammal species than any of the others.

Wolves are also highly vulnerable to "sink habitats". These areas have proven to be deadly to many wolves over a period of time. Removing wolves or packs of wolves from "sink habitats" means other wolves will continue to move into such areas, repeating the cycle of high mortality. More needs to be done to reduce conflicts and reduce the amount of "sink" habitats. The Ninemile Valley in NW Montana is becoming a well-known trap for the wolves that have resided there for the last 15 years. There have been eight wolves killed in the same area within the last two years. Wolf mortality as an annual percentage of the total population is likely to be high.

Metapopulations, classically defined by Levins (1969) as a collection of populations, often occupy patches of source (where reproduction exceeds mortality) and sink habitats (where mortality exceeds reproduction) (see McCullough [1996] and Meffe and Carroll [1994] for more detailed assessments of metapopulation structures). Populations in sink areas can avoid extirpations through demographic "rescue effects" by immigrating wolves from areas connected to the sink (Brown and Kodric-Brown 1977). Immigrants from other patches can also prevent local extirpations or serve as a source of refounders for vacant patches of suitable habitat. Source habitats allow and provide dispersing members of the species to replenish sink habitats. Metapopulation structures also provide a mechanism for spreading risk among populations (Rieman and McIntyre 1993). Mangel and Tier (1994) suggest that metapopulation structures may be more resilient in the face of catastrophes, since there is less likelihood that all the habitat patches (subpopulations) would be wiped out by the same catastrophe since risk is spread among the various sub-populations.

While it is true that wolves in Montana likely experience some level of genetic interchange with wolves residing in Idaho and Wyoming, the U.S. Fish & Wildlife Service goals, as well as those of the other two states, are not significantly different from those in the Montana DEIS. The low N in these isolated and unprotected core areas is of concern in light of the Allee effect (Allee, et al. 1949), defined by the occurrence of a low-density extinction threshold (Nunney & Campbell 1993), which can arise from the difficulty of locating suitable mates when populations are small. Without effective interchange, wolves within the isolated core areas will remain far below viable levels, and will remain vulnerable to excessive risks from inbreeding effects and genetic drift.

According to the Endangered Species Act, species must regain a "significant" amount of their native territories to be considered recovered. Wolves exist in less than 2% of their native territories. Two percent cannot be considered to be significant. Scientific studies must be conducted to determine at what percentage of historic distribution would be considered "significant".

It is clear that based upon the best available scientific information presented above, removal of ESA protections from wolves in Montana is premature at this time. Moreover, public support for wolves needs to be increased in order to minimize illegal mortality. There have already been 25 wolves killed in Montana in 2003, nearly 15% of the entire population of wolves in the state.

Unfortunately, legal and illegal killing will continue until extensive education and outreach actually begins to make a difference. In addition, habitats will shrink and prey base will fluctuate causing natural mortality rates to increase as well. We must compensate that with a scientifically proven viable population of genetically healthy wolves that can successfully sustain legal, illegal and natural mortality and still increase to viable levels. The current population is not viable and cannot withstand these natural and human caused stresses, therefore claims of recovery are premature at this time. Wolves should remain on the endangered species list under U.S. Fish & Wildlife Service management at this time.

Thank you for the opportunity to comment on this proposal, and please keep me informed at this address of ongoing developments regarding the State of Montana Draft Environmental Impact Statement on Wolf Management.

L0295: We urge MFWP to consider and adopt alternative #4. We are extremely concerned with the impact of the growing wolf population. We would rather have seen a continuation of existing numbers of the wolves before reintroduction, but since that isn't a choice we have alternative #4 would be better than the other choices available. Limiting the wolf pairs to 10 might give a fighting chance to sustain the elk, sheep and deer populations. In the history of our state it has been proven that wolves are predators that devastate wildlife populations and the surrounding ranches and their livestock. How can this be a good all-around plan? Being a good steward of our land is an important job worth doing well. Please consider limiting wolves.

L0303: I demand that you vote for alternative 4 of the FWP plan minimum wolves held at 10 breeding pairs.

L0009: 1) #4 starting with the lowest number of pairs since we know they will increase at least at the rate now.

L0065: 1) Alternative #3, 20 breeding pairs, huntable population. 2) State of Montana and others develop compensation program.

L0079: 1) I would like to see alternative 1 or 3 adopted. There is plenty of wild land available to sustain many packs of wolves in Montana. 2) Assure that there is follow-up and monitoring of wolf pack and how they reproduce, how many are poached, where possible predation is occurring to allow the best protection for wolves that are released. If wolf packs are where they need to be there will be little human interaction.

L0081: 1) Alternative 1 because the breeding pair benchmark in the other alternatives is arbitrary. Minnesota maintains a wolf population of around 2600, with 79,617 square miles of land base. This makes the average density of wolves in MN about 1 wolf per 10-15 square miles. Montana on the other hand has 145,556 square miles of land base. 2) Limiting wolves to 15 packs per 150 wolves, means a wolf density of about 1 wolf per 725 square miles. Base the number of wolves in the state on available and sustainable habitat, not random population number.

L0098: 1) Best is #5 because I'm concerned Montanans will be negatively affected by increasing wolf numbers and distribution due to lack of management if wolf not de-listed quickly. Would also support #4 and #2 in that order. 2) My biggest concern is that rural Montanans, the majority of which oppose wolf populations on their private and leased lands, are being required to pay the entire price, in money and in cost to lifestyle, while the majority of pro-wolf are out of state and country, people who pay nothing. Please work on a system to get pro-wolf people to bear the cost.

L0330: Montana Bowhunters Association acknowledge that wolves are here to stay. It is Montana's best interest to see the wolf de-listed and the MDFWP gain management responsibility as quickly as possible. The MBA considers alternative #2 with some modifications, as the best chance for the dept. to maintain wolf populations, wildlife populations, and hunting opportunity and provide a margin of safety for the livestock industry. Wolves should not be managed at the expense of our deer, elk, and moose populations. Our traditional hunting heritage must be preserved in favor of wolves. When prey species numbers are low, aggressive control methods should be applied to control wolf numbers. Preferred benchmark 15 breeding pairs is too high in our opinion. Allowing for 12 breeding pairs is a reasonable compromise that gives a 20% margin of safety above the minimum level. Wolves should be limited to large contiguous public land areas where the potential for conflict is the lowest. They should not be allowed to habitat areas of private property in eastern Montana, nor any major agriculture and livestock producing areas. Support compensation program for livestock owners for losses at fair market value. Funds from the general license account should not be used to compensate for depredation losses. Allow livestock producers and landowners to shoot wolves in order to protect their livestock and property. Allow for a regulated harvest of wolves. The MBA encourages the department to seek federal financial or private assistance to monitor wolf populations. Our license dollars should not be allocated for wolf monitoring. We expect to see litigation used as a means to prolong the delisting process. It's vitally important that the department request some management responsibilities for the interim period that will allow them some control over expanding wolf populations.

E6: 1. The minimum wolf alternative is the best of the choices next to eliminating them entirely. 2. Keep a VERY minimal amount (10 or even less) of breeding pairs inside Yellowstone Park and make the wolves unrestricted legal game at ANY time they are found where legal hunting and or shooting is allowed.

E7: 1. I am satisfied with FWP's recommendation of 15 breeding pairs. My concern is that the de-listing processing will not occur quickly. The numbers of elk calves are quite low. I for one am not willing to sacrifice our elk herd. 2. Faster implementation

E20: 1. Eliminate them. 2. They shoot buffalo when they leave Yellowstone Park. Why don't they shoot the wolves?

E28: 1. Additional Wolf Alternative--with greater numbers of wolves there might be a chance for them actually to thrive amidst a continued public ignorance and paranoia about these valuable animals. 2. Personally I would wish for the classification to remain endangered but am not fully aware of how the State would effectively manage such a population. The minimum number of breeding pairs should be at least 20. Wolves should be managed like other wildlife such as elk bears and mountain lions with no artificial limits on wolf numbers or boundaries.

E30: 1. No Action is the alternative that best addresses my concerns about the future of wolf management. I support retaining wolves on the federal endangered species list and favor having US Fish and Wildlife continue to manage wolves in Montana. Reasons: 1) The current numbers of wolves in Montana do not accurately represent a recovered population. Studies have shown that thousands of individuals are required to have genetic viability not hundreds. USFWS has not conducted a population viability study based on scientific evidence. The arbitrary 15 pack level is simply a number that has been assigned and has not been tested and proven to be a viable level. Sufficient scientific evidence does not exist to prove this. No Population Viability Analysis has ever been prepared for wolves in the Northern Rockies. The Reintroduction DEIS and FEIS (1993; 1994) simply assumed that the recovery goals would provide for minimum viability. However no formal scientific analysis of viability based on genetics and demography has ever been done. Thus it is inappropriate to de-list wolves and turn management authority over to the states prior to having this vital information. There is widespread agreement in the scientific literature that long-term viability for genetic concerns alone requires an effective breeding population size of at least 500 which translates into total population size in the thousands. Also no analysis of migration corridors needed to maintain adequate levels of genetic interchange throughout the region has been prepared. 2) According to the Endangered Species plan species must regain a significant amount of their native territories to be considered recovered. Wolves exist in less than 10% of their native territories. 10% is not significant. Scientific studies must be conducted to determine what percentage of distribution would be considered significant. These studies have not been conducted. 3) With all of the animosity and the uneducated accusations that residents are placing on wolves now is not the time for delisting. Montana has proven that they cannot be responsible enough to ensure a viable population of wolves when in this state alone there have already been 19 wolves killed in 2003. That's over 10% of the entire population of wolves in the state! No analysis of sustainable mortality has been calculated that would be in concert with a population viability analysis. Wolf recovery in the Northern Rockies has been politically driven without adequate consideration of the best available science as required by the Endangered Species Act. 2. I would make the requirements necessary for a USFWS agent to kill a wolf much stricter than those currently in place. 25 wolves have already been killed legally in Montana since the beginning of the year! Ranchers must be held much more accountable for protecting their livestock without the use of lethal means of control for our wildlife.

E40: 1. My concern is that there is a piece missing from the whole process that of a geneticist. The total numbers of animals should NOT be the deciding factor in management strategies but the numbers of BREEDING PAIRS should be determinative. What is missing is consideration of the size of the gene pool. Can we address this issue? (in Montana you say there are only 16 breeding pairs of wolves). I cite as example the chimpanzees of the Gombi in Africa. Their gene pool is now isolated in a 30 sq. mile park and the breeding pairs are decreasing threatening the entire species. The same happens to ground squirrels if more than 50% of the population is killed off and the same is happening to the grizzly as the gene pool decreases and the populations become more and more ISOLATED due to human encroachment on their habitat. Before we make decisions on such an important issue as part of OUR food chain can we include some genetic information?? Perhaps we can discuss a way to live with the other members of our food chain instead of killing them off for our immediate needs? I still find it amazing that someone would actually try to raise llamas or chickens or goats in wolf or bear habitat. Meantime we need more discussion and more reasonable people who do not have agendas of their own. Mostly we need to be inclusive of ALL information which impacts our decisions. 2. Add a geneticist to the mix. Thanks for listening.

E52: 1. Alternative 1. No Action. The gray wolf should not be taken off the endangered species list until their population goes up more. There have to be more breeding pairs before using Alternative 2. Lethal take should only be in defense of life not property. I am against regulated hunting as of yet. 2. Increase the minimum number of breeding pairs under Alternative 2.

E73: 1. Combination of Alternatives 2 and 4. 2. I would like to see a combination of Alternatives 2 and 4 with setting the benchmark at 12 breeding pairs. This would give some leeway above the minimum level established by the USFWS. I believe it's vitally important to give as much autonomy for management to Montana FWP. I also believe that since the USFWS is charged with establishing and monitoring endangered and threatened species much of the bill for reintroduction should be handled with federal dollars. I would hope that federal funding levels under such a proposal would be close to 100% as I understand monitoring would continue to be intensive for several years. Thank you for the opportunity to comment.

E77: 1. Alternative 3 (more wolves) comes the closest to reflecting my beliefs about how wolves should be managed considering the public's mixed feelings about wolves. I would like to see them managed forever as threatened species with a return to endangered listing if numbers drop precipitously. I understand that management must occur knowing that management in many people's minds means killing. It troubles me greatly that Montana has 120-180 wolves and we're talking about maintaining only 10-20 breeding pairs. Where do the rest of them go? I am extremely concerned that some counties have adopted a zero tolerance policies toward wolves and that legislation was introduced in the 2003 session to list them as predators. Given that type of public sentiment I believe we who support wolves as part of the ecosystem will be lucky to have in place a FWP management plan that protects wolves to some extent. I understand ranchers' concerns as I come from a rural background but I believe they must view wolves the same way they view disease accidental death etc. among livestock: Predation is part of the equation. 2. Take more time to determine how many breeding pairs we will accept. I think adopting a hard and fast number 15 breeding pairs or 10 breeding pairs is arbitrary. Once the federal government delists them we should manage them on a case by case basis allowing them to be killed only when they are directly attacking livestock and then see how many are left in say five years. Then we will have a better idea how many breeding pairs to maintain. I predict large numbers of them are going to be killed illegally and immediately once they are delisted. Key to my comments is the belief that the penalties for killing wolves illegally should be very high and that FWP should pursue the illegal killing as aggressively as it pursues game animal poaching. The public should be encouraged to use the hotline to report wolf killings. Public education is also critical. The public needs to be educated about wolf behavior debunking the ridiculous fairy tale image of them as stalking and killing humans etc. Wolves should be included in nongame animal education programs even though at times they may be managed as game animals. FWP and the feds have done a good job of this via public forums etc. but we've only just begun. The public who support wolves have an obligation too. The Defenders of Wildlife and other conservation groups who reimburse ranchers for wolf kills are to be commended and encouraged. Thanks for taking the time to hear me.

E81: 1. None of the alternatives are not acceptable as they allow too many Wolves and do ensure the protection of game animals and live stock. I have personally have witnessed the degradation of game population and hunting opportunities since Wolf reintroduction Hunting Pays for wildlife management in Montana and is a significant part of Montana's economy. Alternative #4 is closest but must be modified to address the above concerns. 2. reduce wolf population to a minimum

Wolf Distribution

Summary of Comments: Comments from eastern Montana recommend that FWP establish a “zone” to limit wolf distribution to western Montana. FWP received other comments suggesting that wolves should not be restricted to just western Montana and primarily on public lands – wolves should be distributed throughout Montana. Other comments suggest that wolf distribution should be limited to public lands only and that wolves should be “zoned” out of private property. Other comments support restricting wolf distribution to national parks or wilderness areas only. FWP also received comments supporting the adaptive framework of encouraging wolves to become distributed in those areas where there is the least potential for conflict.

Response: The preferred alternative seeks a balance between the biological needs of wolves and the concerns of people. The adaptive framework allows FWP to conserve and manage wolves within the context of human social tolerance, wolf ecology, and Montana's requirement to sustain a recovered population by letting wolves find their place on the landscape. Montana can meet its commitment towards the tri-state total based on where wolves are distributed presently. However, the gray wolf is a wide-ranging animal that is capable of long distance movements. Movements up to 500 miles have been documented. It would be impractical, if not impossible, to keep wolves from moving beyond the current distribution into presently unoccupied areas. However there is nothing in the preferred alternative that would a priori require an increase in wolf distribution beyond the present distribution, so long as the number of breeding pairs was adequate to meet connectivity requirements. Rather than establish a management premise that FWP can't fulfill, FWP follows the recommendations of the Wolf Advisory Council in choosing instead to build a broad and flexible management program that allows wolves to distribute themselves according to their ecological requirements and as per social tolerance. It has been FWP's experience that as long as conflicts are addressed effectively and swiftly, large carnivores and people can coexist. Wolf presence in northwest Montana over the last 20 years has also demonstrated that coexistence is possible for wolves in Montana.

Not all parts of Montana will be suitable for wolf occupancy over the long term because of significant or chronic conflicts. It is not easy to predict where those areas will be. Social tolerance varies across space and time and from one landowner to the next. Similarly, the intermingled landownership patterns and land uses, in light of the ability of a wolf to travel long distances even in a single day, make it impractical to “zone” wolf distribution based on distinctions between public and private lands or certain land use or ownership patterns. Even these change through time. Nonetheless, the adaptive framework of the preferred alternative will help managers adjust management to local settings based on wolf numbers, land ownership patterns (primarily public lands and backcountry areas vs. mixed ownership areas), and social factors. This will be accomplished through program implementation at the FWP regional level.

FWP also points out that Montana cannot meet its commitment to the tri-state total by restricting wolf presence to wilderness areas and national parks. None of Montana's current wolf packs reside wholly in wilderness areas or national parks.

FWP is aware of the concerns expressed about wolves becoming established in eastern Montana or on the Charlie Russell National Wildlife Refuge. Likewise, FWP is aware of the concerns expressed by western Montanans that wolves could be distributed to the western third of the state disproportionate to total land area in Montana. Additional discussion has been added to the preferred alternative in the Final EIS to address these comments.

Representative Comments:

W329: Breeding pairs need to be dispersed throughout Montana – maybe dispersed by county.

W188: I'd like some kind of density threshold, where there would be a cap on so many wolves per unit area. If crossed that threshold, wolves would be subject to control of some kind. This is to maintain satisfactory ungulate levels.

W122: 1) #4 – the less wolves the better. Federal funding. 2) Wolves should be distributed east and west and not just in western Montana.

W209: Breeding pairs should be contained to National Parks. Stray wolves that cause problems, i.e. killing domestic animals. Landowner should have the right to shoot that individual.

W211: CMR should be included in the same rules as other lands in Montana.

W329: Maintain breeding pairs in Yellowstone, Bob Marshall, and other wilderness areas, rather than populated private land areas.

W731: I am very much in favor of restricting distribution to western Montana, and away from livestock producing areas.

W764: regardless of what plan is used, there needs to be good geographic distribution.

W772: I like the fact that there is no arbitrary boundary.

W794: They might as well be where they are not going to be a problem.

W1141: I think 15 pairs is adequate across the state. If you have wolves spread out throughout the state, you have flexibility; more adaptive

W1167: Do not limit the distribution to western Montana.

W1174: I'm not for any artificial range limits or boundaries.

W1322: If all the breeding pairs/dens sites are located in GNP or YNP, would that meet federal requirements?

W1226: Wolves throughout the entire state would help share the load.

W1328: Must have an alternative for everyone. Agriculture community could live with alternative 2. But add in zones as in alternative #4. Manage migrating wolves more aggressively. Must de-list first.

W1375: Should take a close look at zoning wolves out of eastern Montana. This could reduce flexibility in western Montana.

W1380: Why aren't wolves distributed across the state? Alternatives focus wolves in the west of Montana.

W67: 1) Alternative #3, in my opinion, is the best alternative. There should be no artificial limits or boundaries. 2) there should be a compensation program in Alternative #2. Funding must be assured before the plan is finalized. It should be "clear" when citizens are permitted to kill wolves and only when there is dire threat to wildlife. We don't manage other wildlife with upper limits and habitat boundaries, we should not do so with wolves.

L0192: I am looking at Alt #2 with some amendments. No wolves would be allowed east of the Rocky Mountain Front. It would be devastating to the agriculture communities of central and eastern Montana. Livestock producers and economics of the recreation would suffer. Rumor has it that private lands will be closed to hunting if the wolf is allowed to establish in eastern Montana. Keep the numbers to a manageable amount of 10 breeding pair or less. Expense of federal dollars.

L0035: I am writing as a hunter, outdoorsman, and RMEF member who is in favor of wolf (and grizzly) reintroduction. The notion that 15 packs constitutes a "recovered" population is not scientifically sound. Wolf numbers do not presently reflect a viable, genetically diverse population nor do wolves occupy a large enough area to be considered out of danger of extinction in the lower 48. Until such time as wolves occupy more of their original territory in greater numbers, FWP should not adopt a management plan. No Action!

L0094: We realize that with all the alternatives you have ones to the far right and you have the ones on the far left. It is most difficult finding an alternative that hits the middle. We believe that Alternative #2 comes as close as any with the exception of a couple of amendments that we would like added. As noted in the Alternatives 3 and 4, 10 breeding pairs and 20 breeding pairs is the benchmark. Alternative 2 is 15 breeding pairs in which with

the maps provided, could be easily accomplished with where the wolves are located now. Although we have heard that your numbers are low as to what the actual numbers of wolves are in the Western part of the State. Fergus County's #1 resource is agriculture with the revenue our businesses receive from hunting not far behind. We, as our constituents in Fergus County, are very adamant that we do not want wolves established in Fergus County, as are other Counties in Central and Eastern Montana. When we passed our Resolution, which I have enclosed, we did not have 1 person come forward and oppose it. We feel it would be detrimental to Fergus County's economy to let wolves establish here. Not only to our ranchers, but also to the businesses that rely on the thousands of hunters that visit our county each year. We have been told that if you allow wolves in Fergus County landowners will pull their acreages from the block management program. Landowners who allow hunting have said they will close their property to all hunting. This would be a devastating blow to the hunting opportunities and economy in Fergus County. We realize that it is critical that we get the wolf de-listed and feel you can do this under Alternative #2 with this exception: You establish a zone for the wolf population. Give landowners more flexibility in the Central and Eastern Zones. We have enclosed a map with our zone on it. We feel that you can obtain your goal of actively managing wolves West of the line we have drawn on the map. Wolves should not be allowed to establish themselves East of this line. A much more stringent management plan should be in place for breeding pairs that migrate. We would like to see the wording in Alternative #4, page 91, added to Alternative #2. Wolf distribution would be artificially zoned so that wolves would be trapped and relocated to Western Montana or removed from the population if suitable release sites could not be found. Wolf presence in Regions 4 and 5 should only be allowed in the areas on our map. The administration, de-listing language from Alternative #4 should be added to the Eastern Zone on our map for Alternative #2. We believe our Resolution # 6-2003 speaks for the constituents of Fergus County.

Resolution # 6-2003

A Resolution Expressing the Intent of the Board of Commissioners to Declare that Wolves are an Unacceptable Species.

WHEREAS, the health, safety, and livelihood of the citizens of Fergus County are the responsibility of the Fergus County Commissioners who are duly elected by the citizens of Montana; and WHEREAS, the three elected County Commissioners of Fergus County, do hereby condemn any effort, under the Endangered Species Act (ESA) or otherwise, which allows for the presence, introduction, or reintroduction of any animals, within the boundaries of Fergus County, which are deemed by the Fergus County Commissioners to be a threat to public health, safety, and livelihood; and NOW, THEREFORE, BE IT RESOLVED that the Board of County Commissioners, Fergus County, State of Montana, by the authority vested in us, do hereby prohibit the presence, introduction, or reintroduction of any animals which pose a threat to public health, safety, and livelihood within the boundaries of Fergus County, and shall take any and all actions necessary to protect its citizens. NOW, THEREFORE, BE IT FURTHER RESOLVED that the Board of County Commissioners, Fergus County, State of Montana, by the authority vested in us, do hereby prohibit the presence, introduction, or reintroduction of wolves within the boundaries of Fergus County. Passed and approved this 26th day of March, 2003

L0146: 1) Alternative 1. Twelve to fifteen breeding pairs statewide is a ridiculously small number for a state the size of Montana. The ranching industry is being given too much consideration – livestock losses – within limits are an acceptable price to pay for a healthy predator population, statewide. 2) As wolf populations increase and require controls, I advocate rifle hunting only. No trapping should be allowed. Bring wolves back to the Missouri Breaks in the new national monument.

L0285: Montana Outfitters and Guides Association: Regardless of the management plan that is ultimately selected. It is critical that wolves are delisted as quickly as possible. It is also critical that the plan is based upon the premise that preservation of our hunting heritage, through strict control of wolf predation on big game populations, to the extent allowed by law, has the highest priority to the Montana sportsmen and women, outfitters and landowners. It is tempting to say that MOGA's first choice for Montana's wolf management plan is Alternative 4, however there are important concerns associated with alt. 4. Alternative 4 appears to be driven by private landowner's low tolerance for wolves, tolerance that is certainly understandable. The problem arises when one considers the results of zoning and forcing wolves into public land, mostly in western Montana, rather than a more equitable, wider pattern of distribution. Alternative 4 may provide for trapping and hunting, but probably only in the beginning when the wolf populations need to be downsized quickly. Once the populations reach objective, trapping and hunting might become an occasional management tool, with strict quotas, rather than an ongoing one. Managing for a minimum of ten breeding pairs would be extremely expensive, as FWP would be forced to monitor wolves much more closely than with alternative 2. While wolf predation on big game populations would be minimized under alternative 4, the risk that Montana could fall below the population objective and return to a "listed" status is too important to ignore. After careful consideration, MOGA wishes to go on record as supporting Alternative 2 with some modifications. We believe that 15 breeding pairs is unnecessarily conservative. MOGA believes that 13 breeding pairs is sufficient and practical for the following reasons: 1) Three additional breeding pairs will provide a safety margin for FWP. The amount budgeted may not be sufficient. 2) Alternative 2 allows the wolf to be declared a big game animal for the purposes of trapping and hunting and the more conservative population objectives should result in a consistent trapping/hunting season. 3) Alternative 2 provides for a liberal cooperative relationship with private landowners. Alternative 5 should be considered a "default" position and not a first choice. Alternative 5 appears to mandate management by federal rules rather than Montana law - and provides no federal funding.

L0334: We are in favor of it coming off the endangered species and going to state authority. It is a devastating predator to our industries in eastern Montana - our livelihood involves chiefly cattle, sheep and horses. It is extremely hard to make ranching pay the bills now without fighting wolves. Also it will be a tremendous loss to hunting, as the wildlife numbers will really diminish with the wolf coming in. Probably most of the hunting areas will be closed off to hunting if this happens. It will most certainly affect the economy of the county because more and more ranches will have to go out of business. Keep them out of central and eastern Montana. West of the mountains is OK, but please keep them away from us.

L0081: 1) Alternative 1 because the breeding pair benchmark in the other alternatives is arbitrary. Minnesota maintains a wolf population of around 2600, with 79,617 square miles of land base. This makes the average density of wolves in MN about 1 wolf per 10-15 square miles. Montana on the other hand has 145,556 square miles of land base. 2) Limiting wolves to 15 packs per 150 wolves, means a wolf density of about 1 wolf per 725 square miles. Base the number of wolves in the state on available and sustainable habitat, not random population number.

E87 1. The no action alternative would keep wolves on the endangered species list where they belong. According to the Endangered Species plan species must regain a significant amount of their native territories to be considered recovered. Wolves exist in less than 10% of their native territories. 10% is not significant. Scientific studies must be conducted to determine at what percentage of distribution would be considered significant. These studies have not been conducted. 2. nothing:

Social

Summary of Comments: These comments reflect the differing philosophical, value-based opinions, and the human dimensions surrounding wolves, wolf management, prey populations, etc. The social, cultural, and aesthetic values people assign to the gray wolf today grow out of a long, colorful history of interactions between wolves and people. Public opinions about wolves and their management vary greatly. FWP received public comments reflecting the full spectrum. Due to the difficulty in characterizing and summarizing this group of comments, the reader is encouraged to review them below.

Response: A successful conservation and management program for wolves ultimately depends on people and their attitudes. The social factors that shape public interest in or tolerance for wolf presence and how conflicts are resolved are equally important components of any wolf management program. FWP's preferred alternative, based on the work of a stakeholder group, seeks to find common ground between wolf advocates and those most directly affected by wolf presence. A compensation program is one component that will address economic losses experienced by livestock producers due to wolf depredation. While a compensation program may not address or financially mitigate all the costs and challenges of wolf restoration within landscapes that include livestock, it does increase awareness of those challenges and stimulate discussion about how to address them more comprehensively.

In addition, the underlying philosophy of the preferred alternative is one of balance and recognition of the wolf as a native species. FWP will seek to integrate and sustain a wolf population in suitable habitats within the complex biological, social, economic, and political landscape of Montana. While that may not be an acceptable outcome to all citizens, wolves in Montana are here to stay. FWP and the Council believe it is in Montana's best interest to move forward with a state-based management program.

FWP anticipates that the public will readily identify real or perceived problems or shortcomings of the program. The challenge for FWP will be to discern between earnest differences of opinion in preferred management direction and substantive shortcomings of the program. Difficult decisions will have to be made and will sometimes be called into question by various interests. The public is invited to continue participating with development and implementation of the wolf program.

FWP did receive several comments about whether FWP adequately recognized the authority or jurisdiction of tribes and the potential impacts of state actions in Indian tribes' cultural and spiritual relationship with wolves. FWP has considered and fully recognizes the authority of Indian tribes to manage wildlife within reservation boundaries. FWP did not assess the impacts or effects of its preferred alternative on reservation wildlife or cultural aspects of Montana's Indian tribes or reservations. Montana does not have jurisdiction for wolf management on reservations, yet remains respectful of the cultural wildlife traditions of the tribes. FWP does welcome partnerships with tribal authorities to manage wildlife populations of mutual interest and potentially overlapping jurisdiction in the case of packs that move on and off reservations.

Representative Comments:

W7: This issue is going to be difficult to keep everyone happy.

W20: Let's put wolves back into eastern part of the U.S., not just out here in the west.

W66: The longer you do nothing the more difficult it will be to balance the approach.

W95: Go middle of the road to help manage problem areas.

W215: FWP should adopt a zero-tolerance for wolves because of impact to deer/elk and financial impact to department and state.

W227: A lot of environmental groups would like to get domestic livestock off public ground and wolves are just a tool to achieve that.

W239: It took 100 years to get rid of wolves; now we want to bring them back?

W247: Should be 6 alternatives – no wolves at all.

W260: Livestock producers ultimately pay for wolves.

APPENDIX 5

W381: Rest of the population in the country want wolves here. They can pay for it.

W455: We can make it work if we work together.

W23: 2. More education to the general public on researching alternative ways of raising livestock in order to decrease the losses. I want to see more science – are the benchmark ##s ecologically viable?

W469: Not even close to being extinct – they are not needed or wanted here.

W494: In concept, ESA law may be appropriate, but should not be a back door approach. This is not just a wolf ecosystem – there are people, wildlife and livestock.

W519: Will never be able to develop a compensation program that fully compensates the landowner for livestock loss.

W600: This is a new predator here, and everyone needs to learn how to deal with it.

W604: I think if the state takes over and people don't complain too much and work together and don't get bent out of shape, we can make this happen.

W619: Pro-wolfers also suffering a loss, ethical emotional loss when a wolf is destroyed.

W621: Rancher suffers emotional loss – it's not just the money.

W654: Most ranchers already learned to live with difficulty and can rise to the occasion, make the adjustment. The adjustment is to sell.

W740: There needs to be a healthy balance.

W807: I don't like to kill wolves. I don't like to take care of other people's problems - I'd rather that they aren't out there.

W831: Why is FWP stuck with this plan when they already have enough to do?

W854: If you live in an area next to someone who tolerates lots of wolves, you're going to have problems.

W890: Feel that public comment on EIS had no effect on what was printed last year.

WW954: I want wolves; I want them to be managed to interface in a humane way.

W1019: Protect Montana lifestyle of hunting.

W1046: All pro wolf people are not anti-hunting.

W1086: Don't listen to nonresidents. You work for the residents of Montana.

W1112: I hope that this wolf management program does not become a burden on the people of Montana. It should be federally funded.

W1147: Let people care for their own problems. We will never be out of wolves; people are knowledgeable enough to take care of their own problems.

W1192: I am concerned about public image of hunters if wolves are shot.

W1195: Hunting ... Montana is wilder; I like to hike in grizzly country; same for hunting – seeing wolf tracks made my hunting trip. No mention in EIS relative to how the hunting experience is enhanced by wolf presence.

W1224: Not really in favor of wolf management, but alternative #2 is probably the best/safest way to go.

W1229: Compensation should be for ranchers but also loss to sportsmen should be considered and compensated for as it was sportsmen dollars that brought back the prey species.

W1331: Ranchers and wildlife add to the quality of Montana life. I like alternative #2 – it's the most fair.

W1344: Man is a predator of no less importance than wolf and lion. We are predators. Important to state that. Hunter is as important in the food chain as lion, wolf and bear.

W1409: Wolves are just an excuse to end hunting.

W1411: Our Fish and Game Department is against the sportsman for wanting and supporting wolves and wolf management.

W1425: Trying to make things like they were 100-200 years ago and it can't be done – too much has changed.

W1443: Managers need to have flexibility to have protections from political influence.

W1473: I do not understand how you are going to manage them.

W7: 1. Don't put any money into wolf programs, if such money is needed elsewhere. IF ANYTHING BE UNESSENTIAL, IT IS WOLVES. 2. Shut off all money to the wolves and their protection until abundant proof is shown of lots of human benefits to have from having these predators in our environment.

W17: Alternative #2 is our choice. Although this alternative is not perfect, what is? We believe this alternative allows ample flexibility for the State of Montana, names the Department of Fish, Wildlife & Parks to take on the responsibility of managing these magnificent creatures.

W49: 1. Reluctantly, the Valley County Resource Use Planning Committee would have to select Alternative Plan 4 as the least damaging. 2. Congress in the Federal Land Policy and Management Act, 43 USC Section 1712, has required the Secretary of the Interior to include local government officials in the federal land use planning process.

By this process, the Valley County Resource Use Committee is charged with the responsibility of developing plans and making recommendations to the Valley County Board of Commissioners on issues relating to the use of the federal lands and impact which that use has on private lands and the economic and social structure of the county.

This committee is in total agreement with the Valley County Board of Commissioners and it is the firm belief of this Committee that the wolf, by definition, is a predator and should be assigned the status of predator and managed according to that status.

Historically, wolves have been proven to be detrimental to the health, safety and livelihood of the county citizens, therefore, the presence of wolves is not desirable.

In addition, if costs of administering a federally mandated management program are wrongly imposed on state and county governments, taxpaying citizens will be expected to carry an unfair burden of sacrificing repeatedly for a program that is supposedly for the public good.

The Valley County Resource Use Planning Committee is disappointed that there is no alternative plan presented that is consistent with the goals and objectives of this Committee and Board of Commissioners.

Reluctantly, the Valley County Resource Use Planning Committee would have to select Alternative Plan 4 as the least damaging.

We would like to request all involved agencies ensure that policies are in accordance with statutes and can also produce data and timely information in conformance with the data Quality Act, Section 515.

The Valley County Resource Use Planning Committee respectfully submits this documentation to be a matter of public record.

W41: 1. Need to have wide flexibility to control wolf. Given the Yellowstone sanctuary, there will never be a threat to wolves as a species. This must be taken into consideration as one considers requirements for maintaining a wolf population. 2. Outfitting and ranching are big contributors to the economy of Mt. Wolves are largely, a dream or, at best unsubstantiated or immeasurable benefactors. If ranchers and outfitters can not make a living, then you will only see more development and subdivision

W55: 1) None. The local people do not want wolves here. The federal government spent millions to get rid of them. If people want wolves put them in the city, not here. 2) Eliminate them now!

W60: 1) The world is changing and meat eating and the meat industry is going to be greatly downsized. Perhaps the meat-raising farmers will be forced to grow organic vegetables instead, and then the wild life won't be the problem they are now. I would like to see this happen. I say get rid of the cows and sheep farming in the areas near the natural predators and that's not going to happen anytime soon with the way people think, but the world is changing. 2)I'm for #1 or #2.

L0037: USFWS has spent millions to establish these wolves in Montana, and now that the wolf population is multiplying rapidly, they want to dump this mess on Montana. FWP proposes to accept this responsibility and this should be refused for the following reasons: 1) Money. Montana does not have \$800,000.00 a year to spend on wolf management, and it certainly won't have the ever-increasing money needed as these wolves increase. Managing these wolves is not a Montana responsibility - it's a Federal responsibility. Until Congress passes laws providing money to fully fund that responsibility, all further planning is a waste of time. 2. Publicity. USFWS apparently killed at least a half dozen cattle-killing wolves in the last 12 months in Montana. Every year far into the future, more wolves have to be killed every year because they're attacking livestock.

Our State spends a fortune every year trying to encourage tourism. What is the possible logic of allowing those advertisements to be offset by TV pictures of Montana officials "murdering" the wolves? 3) Wolves will decimate our big game. Big game hunting is Montana is a major economic and pleasure activity, both for locals and for out-of-staters. These ever increasing packs of wolves are going to decimate our deer, elk and moose, and our hunting economy will evaporate. 4 Let the USFWS keep the wolf problem. USFWS wants to give Montana control, but USFWS expects to continue to tell Montana how many breeding pairs we must maintain; when and under what circumstances Montana can allow a wolf to be shot, etc. If Montana takes over wolf management under any USFWS approved plan, USFWS will continue as the great father, disciplining Montana if any facet of our wolf management doesn't meet great father's requirements. Wolves so far the USFWS problem and the wolves are rapidly multiplying and the problem is rapidly getting worse. Why should the State of Montana assume this problem? Why shouldn't this continue to be a USFWS problem and why shouldn't Montana make every effort to require USFWS to protect Montana's citizens from the depredations and losses these wolves are going to cause us as these wolves rapidly proliferate?

L0126: 1) Let us get rid of all the wolves in Montana and if people want to see wolves they can go to Canada where there are a lot of them it will save us many millions of dollars. This looks like some bureaucratic waste of money for nothing.

L0025: Who needs the wolf? This is a worthless program. I do not want any of my tax dollars wasted on the wolf program. We have more wolves than we need now. If you want to see a wolf, go to Bear Country in South Dakota.

L0041: I find it truly appalling and inhumane that \$800,000 is taken away from families with little food, little means of keeping warm, elderly buying medicine, education of our children and a growing tax bill for the average American to support 183 wolves. Where the hell is the FWP's sense of

balance concerning humans and predators. You simply have "NO SHAME". Our forefathers had the wisdom to kill these predators out. Now our own government had betrayed the backbone of America- it's farmers and ranchers. Do you know where the food on your table came from? Do you care whose tax dollars you are poking down a rat hole?

L0272: We have never seen a wolf so why do we need them? Grandfather told of wolf packs chasing teams and wagons with families running for their lives. If you want to see a wolf, put them in a locked-up zoo or park.

L0044: In keeping with the importance of Montana's heritage, the state should invest in the Updated Council Alternative, which satisfies both the concern for ranchers and those concerned with wolf recovery. By keeping the wolf on the ESA, Montanan's are further relinquishing their ability to control wolves, by keeping wolf management in the hands of the federal government while hindering other species chances of recovering. If wolves are kept on the ESA 29 other species will continue to wait to be listed until enough funding is available. The funding of wolves under the ESA could be used for those other species, once the gray wolf is de-listed. Therefore, wolves need to be de-listed, and managed properly through the Updated Council Alternative. In choosing this alternative, several sides will be satisfied. Because Updated Council allows more flexibility in wolf management, ranchers could kill wolves "threatening to" or in the act of killing livestock. Yet, the regulations regarding wolf management would also insure that wolf numbers are bountiful and healthy, placating the wildlife conservatives. The flexibility of the program also allows revenue to be raised for the state of Montana. Under MFWP's management, when wolves are de-listed a hunting season could be established. This would provide additional funding for wildlife management because as is big game hunting, those wishing to attain a permit would have to purchase a license. It also could bring money in to the state with the sale of out of state licenses.

L0043: I am in favor of leaving wolf management to the U.S. Fish and Wildlife Service to be protected by the Endangered Species Act. I don't think wolves should be hunted under any circumstances. They are important predators that help keep other populations of wild animals healthy. I don't think the loss of a few domestic animals justifies killing wolves. Please select the alternative in the Wolf Plan EIS that reflects these views.

L0056: I urge you to assure the state funding as your first step in this process. Then please clarify the specifics for wolf kills-- only when wolves pose an immediate threat to livestock. As you know that policy has worked in every other state where it has been tried and predation has not been a problem, despite worries about it. Montana has the healthy environment to support a minimum number of breeding pairs of wolves--specifically as outlined in Alternative 3 of your draft EIS. This is of course critical to long term survival. And because you enjoy the wonderful gift of a healthy environment the wolves should be managed as other wildlife it, and with no artificial limits on wolf boundaries or numbers. Montana and its citizens can act with a view for the long term, with respect for all the wildlife and open lands that so many of your fellow Americans no longer enjoy. It is a heritage that deserves real appreciation and real planning in order to protect your land and animals for those who come after us.

L0091: I am in favor of NONE of the Alternatives offered in the Draft EIS, as each of them is unsatisfactory in one way or another. One basic problem is that wolves have been inflicted upon the population without significant substantiation of need, reasonable rationale or purpose, and without consent and approval of the people. It is perfectly obvious that this species is in no way in danger of extermination when, as someone stated last night, the state of Alaska sees fit to offer five wolf hunting permits per hunter. We, here in the Flathead, know from sad experience in the past that mistakes can be made by various governmental agencies in the management of our wildlife and environment. Now, what assurance do we have that, in the very near future, the FW&P will shrug their shoulders over the outcome of the wolf program, and simply admit that, of well, maybe this has been a mistake...not such a good idea? Ravenous wolf packs are proliferation at a rapid rate and devouring our game animals. Beleaguered ranchers are struggling to survive on a very narrow profit margin. The loss of a calf in a cow/calf operation by rights should be reimbursed at the price of a full-grown animal because that was the anticipated sale value of this animal. Calves growing to maturity are the end product of this business and that investment and potential has been lost. Then in addition to the financial loss, this busy rancher customarily working 12 or more hours a day, had the added burden of repeatedly completing government forms, meeting with FW&P officials and trying to prove that the loss of each calf and/or cow is, in fact, due to wolf kill. The ongoing concern and harassment and futility of it all is causing ranchers to give up the life and livelihood that they love and put that ranch up for sale. It is all lost through on-going worry and concerns over wolves and the intrusions of federal or state agencies into his life and sense of security. One cannot help but wonder if, somewhere in this program this might possibly be the true objective and strategy to achieve an unpublicized agenda. The provision or non-provision of compensation is one of the variables within the four alternatives. It is an open-ended statement. Implied is the compensation for livestock loss, but how does an agency measure and compensate for a beloved dog, a child's pony, or the child itself? There is no compensation for finally giving up and selling out the ranch, or going hunting and coming home empty handed. There are endless studies and reports on the wolf monitoring and counting them, collaring, tracking, etc.etc. which assures extensive increased in staffing and personnel at taxpayer expense. This is to say nothing of cost of lawsuits by the environmental community who are never quite satisfied with how much is being done for the wolf. People's lives are changing drastically due to over-bearing, oppressive rules, regulations and restrictions inflicted upon them. Those who know the wolf can for-see increasingly devastating impacts with its proliferation and expanded territories. We have here a proposed wolf program which we are being asked to agree to with just too many open-ended, totally un-measurable variables. Also we are told that the problem wolves that take a liking to cattle can be managed. That is the FW&P term for KILL. Let's face it, ALL WOLVES are problem wolves since ALL wolves love and eat anything that moves, including cattle. It is just not fair to limit wolves to the sparsely populated rural, where so few people can enjoy them. Perhaps Montana FW&P was surprised at the relatively low attendance at this public comment meeting as compared to the first one held many months ago. I think we can see here a sense of disparity, futility, and impending doom. The absentees from this meeting did not stay away out of lack of interest and concern. They know the nature of wolves and results, in other regions, of their over-population. They can for-see how quickly this entire venture can get completely out of hand; out of control. Perhaps they are resigned. I hope not. We must warn and inform those who are unaware and uninformed of the dangers in this wolf program.

L0125: We would like to comment on Montana's Wolf Conservation and Management Plan. The title of the plan implies that wolves are to be maintained in the state of Montana and not allowed to become endangered again but it seems that several counties have already voted wolves to be "unacceptable" in their counties. We have a lot of fear that if wolf management is turned over to the states, wolves will soon be eradicated as they have been in the past. We would like to see wolf populations protected and even increased beyond current levels in order to ensure a truly viable population now and in the future. Our first preference in Alternative 1. If management must be turned over to the state, then Alternative 3 which calls for additional wolves would be our next choice. We believe that the presence of wolves in our state enhances the quality of life her and is a vital part of what makes this a wonderful place to live. A place where all creatures great and small are valued.

L0137: 1) Since when was it rational (ever) to put animals before human beings? 2) The livelihood of the rancher and farmer far surpasses the re-establishment of wolves any day! 3) It took many years to remove/clean out the wolves in Montana (due to their destructive ways)! Call it what you will but big money was lost by ranchers and farmers! Why would anyone in there right mind want the wolf back? 4) Any/all plans to re-introduce wolves is insane- period!! 5) Those people who want wolves back in Montana other states (to do their damage) again must live in a fog! Wolves cannot be contained to certain areas- they roam!!! 6) The only sound plan is to remove wolves from farm and ranch areas- they come first (ranchers/farmer) wolves should be gone, gone, gone!!!

L0140: 1)Alternative 1. Twelve to fifteen breeding pairs statewide is a ridiculously small number for a state the size of Montana. The ranching industry is being given too much consideration - livestock losses - within limits are an acceptable price to pay for a healthy predator population, statewide. 2)As wolf populations increase and require controls, I advocate rifle hunting only. No trapping should be allowed. Bring wolves back to the Missouri Breaks in the new National movement.

L0188: My selection of the 5 alternatives is Alt. #1. The removal of federal protection for the gray wolf is premature at this time. In Montana there is significant hostility and fear directed at this species. The local governments of Phillips and Fergus counties have stated that "wolves constitute a menace to society that cannot be tolerated. Dan Fuchs sponsored house bill 283. If this is an example of what the wolves will have to deal with in their struggle to survive it appears that FWP hasn't done the necessary public outreach to assure that when the wolves are delisted they aren't slaughtered and have to be re-listed again. FWP revenue is directly linked to sale of hunting licenses. Since wolf recovery depends on prey species, FWP would be pressured by hunting interest to aggressively manage the wolf population. I don't believe that the state of Montana would actually manage the wolf program at the high range. The livestock industry and hunting interests would never allow that. Since FWP would meet their legal requirements with the low end range, that's what could be expected. The state run wolf management program would undermine and reverse the gains that the wolves have made under federal protection. While I think that the state of Montana should be permitted to manage the gray wolf along with other wildlife species, the draft EIS suggest that they cannot be trusted with that responsibility at this time. Even FWP's preferred alt. 2 relies too much on micro-managing wolves when prey populations drop. Therefore, this delisting process presents a conflict of interest for FWP. To have a more balanced approach to wolf management. FWP could implement revenue raising programs other than selling hunting license. I don't believe that public attitudes have changed that much regarding wolves. They have been brought back into an environment where most people don't know how to live with them. In order for people to accept wolves, their fear and hatred has to give way to more tolerance. Public outreach programs and services might bring that about. But once again, these changes need to occur before wolves are delisted and managed by FWP.

L0226: I believe your job is to encourage the growth of big game species of MT. Not predator species and obtain research grants at taxpayers money for your own personal job security.

L0240: Montana is a State that has great diversity in its mountains and plains, its lakes and rivers, its forests and prairies and its wildlife species. The Plan by the Montana Department of Fish, Wildlife and Parks (FWP) to conserve and manage gray wolves that are now at population levels considered adequate to remove them from their protected status under the Threatened and Endangered Species Act represents an opportunity for Montana to incorporate the management of wolves into the comprehensive program of wildlife management that includes the major predator and prey species in Montana. The Montana Wildlife Federation (MWF) has followed closely the recovery of wolf populations in Montana and has provided comment and suggestions relative to the development of a management approach by the Montana Wolf Management Advisory Council and in the development of strategies and alternatives for a management plan by Montana Fish, Wildlife and Parks.

MWF fully supports FWP in their recognition of the gray wolf as a native species of Montana and is in agreement that wolf restoration is consistent with Montana's history of wildlife conservation. MWF also fully supports FWP in their commitment to manage the recovered wolf populations in accordance with Montana's laws, policies, rules and regulations. We believe that the Montana Wolf Management Advisory Council developed a very responsible approach to addressing the issues of wolf management relative to both wildlife and livestock interests in Montana. The Council also could vision a need for and developed a framework to address the issues of human safety and protection of private property in their wolf management approach. We believe that management of the recovered wolf populations under State adopted guidelines will provide a more flexible, adaptable and responsive program that considers the various interests and needs of Montanans. We believe that only under State management can measures be implemented to control wolf populations and wolf distribution to address concerns for livestock interests and operations. We believe that only under State management can concerns for deer, elk and other prey populations be given appropriate consideration while maintaining recovered wolf populations in Montana.

MWF supports FWP in the concept of managing recovered wolf populations at a level somewhat above the minimum population of 10 packs in Montana that represents the threshold for possible re-listing under the Endangered Species Act. We believe this is essential to providing the flexibility of management that will be needed to address issues and concerns relative to wolves in Montana. We believe that wolf management should be an active program that can balance the concerns for both predator and prey populations and that a fully funded monitoring program is an integral part of the management effort. We believe that recovered wolf populations should be distributed widely within the recovery area to enhance stability in wolf populations and in prey populations. We believe that management tools and pro-active measures should be implemented to minimize livestock depredations throughout the wolf management area.

MWF believes the efforts of the Montana Wolf Management Advisory Council and Montana Fish, Wildlife and Parks can result in a balanced management approach that integrates wolves into the realm of native wildlife that is considered by Montanans as their wildlife heritage. We applaud FWP for accepting the challenges and responsibilities of managing a recovered wolf population in Montana.

L0242: I am writing to ask that the wolves in Montana NOT be harmed, trapped, snared or hunted. I ask that the wolves in Montana NOT be removed from the Endangered Species Act. I ask that the wolves in Montana be protected. This is crucial. All animals are God's creatures. All animals have both physical and emotional feelings. Animals can feel pain, stress and fear. Your help is greatly needed - now. Please help to save and protect God's creatures and the environment. Laws, rules and regulations should become stronger and be more strictly enforced to better help save and protect all animals and the environment everywhere. Soon. Funding of the state program should be assured before the plan is finalized. Provisions for when citizens are allowed to kill wolves should be clear and specific, permitted only when wolves pose an immediate threat to livestock or people. The minimum number of breeding pairs should be at least 20, as outlined in Alternative 3 of the draft plan, to assure long term survival. Wolves should be managed like other wildlife, such elk, bears and mountain lions, with NO artificial limits on wolf numbers or boundaries.

If the wolves begin to over populate, there should be a sterilization used or created in an edible bait type form. Many wildlife become a "problem" due to weather, sprawl, polluters, loggers, development, etc....Sad. Thank you for taking the time to read this letter on this very important issue. I hope that you do receive this letter and in time. Thank you!

L0251: The Humane Society of the US does not consider the gray wolf to be fully recovered in the northern Rockies region, much less the western DPS as a whole, primarily due to relatively small, isolated populations in this area and insufficient integration into the ecosystem. The attitudes of some citizens in this area continue to be very negative toward wolves. We are concerned that these negative attitudes will continue to pose a threat to the long-term survival of the gray wolf in this area. At minimum, these attitudes could result in a heavy reliance on lethal control to address wolf-livestock conflicts as well as pressure on the state wildlife agencies to allow hunting and trapping of wolves, once federal protections are removed. We suggest that when MFWP does assume responsibility for wolf management, it must do so with the understanding that it is maintaining this species in trust for the nation.

Although the preferred alternative (or the additional wolf alternative) may provide some protective measures, we are concerned that these measures may not go far enough to ensure the long-term viability of the wolf. Long term survival of the population will require not simply a particular number of individuals in the population, but enough reproductive adults to account for loss of genetic variability due to chance processes over time, as well as variation potentially lost as a result of disease or weather-related events. While we are not satisfied with the USFWS definition of a pack is sufficient to ensure long term viability (and ecological foundation), the much loose definition of a pack suggested in the DEIS would be absolutely unjustified and could jeopardize the long-term survival. Mistakenly classifying such a group as a breeding pair, with the assumption that it includes a breeding pair, could jeopardize the survival of the wolf population in Montana. This would be especially problematic if such a classification leads managers to allow for increased hunting and trapping or more liberal methods for dealing with wolf-livestock conflicts. We urge MFWP to adopt a definition of a wolf pack that is more rigorous and biologically relevant than the current USFWS definition. This definition should be retained even after the five year intensive monitoring period. We especially urge MFWP not to revert to an even looser, less biologically appropriate definition of social group.

We also do not see any justification for using a particular number of breeding pairs as a trigger for changes in management decisions. Human-wolf conflicts will not necessarily be reduced by reducing wolf population size via recreational harvest or through more liberal predator control. Attempts to reduce the wolf population (through hunting and trapping) to the extent necessary to actually produce a reduction in conflicts will likely put the wolf population once again at severe risk of extirpation. We suggest total MFWP and cooperating agencies rely on public education and assistance with non-lethal means of preventing or reducing conflicts with wolves. Conflicts between wolves and humans can be effectively addressed through non-lethal means (increase wolves' wariness through the use of frightening devices or by killing only the problem wolves. Increasing overall wolf mortality when the state counts breeding pairs may have unintended consequences as well, such as destabilizing pack social structure and territory defense, or increasing the number of dispersing immature wolves. We are concerned that establishing a trigger in terms of the number of breeding pairs, through not intended by MFWP as a population "cap" may essentially function as such. It may inadvertently send a message to the public that only so many wolves can be tolerated, no matter how well the public prepares themselves to prevent any potential problems with wolves. At worst, the management trigger could make it difficult for the gray wolf to truly establish itself and for balance to be restored to the ecosystem. Data from other states indicate that an increase in a wildlife population does not necessarily correlate with an increase in complaints or conflicts associated with that species. We urge MFWP to abandon the use of a particular number of packs as a trigger for changes in management. Instead, MFWP should retain conservative management of wolves (i.e. only minimal human-caused mortality via conflict control activities allowed and no hunting/trapping) regardless of the number of breeding pairs or packs. Wolf recovery depends vitally upon the availability of suitable habitat -- for wolves, large well-distributed refuges are important to maintain sufficient genetic variability. The DEIS acknowledges the importance of dispersal, but indicates that no corridors are planned specifically. Therefore the ability of wolves to disperse will absolutely depend upon tolerance by humans, especially if MFWP does not plan to cooperate with other agencies to restrict grazing leases in areas with a high potential for wolf-livestock conflict. We suggest that the importance of dispersal constitutes an important reason not to allow recreational hunting and trapping for wolves now or in the future. We are concerned that hunting/trapping for the wolf may be established or liberalized in the future for the sake of ensuring continued hunting opportunity for hunters interested in hunting elk and other ungulates. Allowing recreational killing of wolves or of predators for this purpose is simply unnecessary and unjustified. If necessary, the number of elk killed by human hunters may have to be reduced. We are also concerned that declines in elk hunter success in the absence of actual elk population declines may be used as justification to allow or increase the recreational killing of wolves. From an animal welfare perspective, designated the wolf as a game animal or furbearer sometime in the future would allow for hunting and trapping methods that many members of the public consider to be inhumane for any animal, including the wolf. HSUS is opposed to the use by the public or by Wildlife Services of leg-hold traps, neck snares, let snares, or other trapping methods that have the potential to result in prolonged suffering and injury.

HSUS recognizes the importance of helping livestock producers to safeguard their livestock and to coexist safely with wild predators. However, the goal of reducing livestock depredations does not require the use of liberal lethal wolf control, even when wolf population size is perceived to be large in the area. The use of livestock guarding animals and other non lethal measures should be combined with livestock husbandry improvements in fencing, prompt removal of carcasses, and providing greater protection and supervision of the vulnerable old and very young cattle and sheep. When depredations occur in spite of responsible husbandry and other nonlethal preventative techniques, aversive conditioning and the use of frightening devices can be employed to alter the behavior of depredating wolves. However private citizens engaging in these techniques for the protection of livestock or other property should be properly trained so that they are used effectively and do not cause unnecessary injury or suffering. Widespread nontargeted lethal control or unrestricted hunting/trapping is at best not necessary for the protection of livestock. We are concerned that the DEIS provides only limited information on the nature of the assistance that MFWP or WS will provide producers regarding livestock husbandry improvements and nonlethal predator control methods. HSUS urges MFWP to give greater consideration in the final EIS to nonlethal control methods and use lethal only when all feasible nonlethal control and prevention methods have been exhausted, regardless of the number of breeding pairs. If lethal control is unavoidable, wildlife management professionals are best suited to this task and are more likely than private citizens to target the appropriate individual and to effectively minimize pain and suffering. We ask MFWP to provide more detail in the final EIS on types of assistance -- such as workshops, onsite demos, information on how to purchase and train livestock guarding animals. We also urge MFWP to specify that any lethal control, conducted for the sake of protecting livestock is only conducted when a depredation has been verified and only after all feasible nonlethal techniques have been attempted. HSUS is strongly opposed to the use of chemical toxicants (including sodium cyanide, sodium fluoroacetate) restraining traps, kill traps, denning, aerial gunning and other methods that may result in prolonged suffering. We are particularly opposed to "preventative" lethal wolf control in which wolves would be killed in the absence of verified wolf depredations. It is unreasonable for livestock producers to expect all risk of predation to be removed=moved. This goal could only be reached by killing every wild predator. HSUS agrees that the affected livestock producer should be eligible for compensation at fair market value. We agree that this is an important way to maintain residents tolerance for wolves, at least until more efficient means of nonlethal reduction to risk is more widely used. We urge MFWP to at least establish a

temporary wolf depredation compensation fund using state money. Such a fund could expire on a previously determined date under the assumption that other sources of funding will be found in the meantime. This would reassure the public that the state is prepared to take on the responsibility of managing wolves after delisting. We urge MFWP to provide more concrete details on the potential funding for an incentive program and/or proactive program. We appreciate the clarification that a wolf must be "attacking or killing" a domestic dog before a person could legally kill the wolf. However, we are concerned that this distinction between a threat and an actual attack may be difficult to enforce. While we certainly do not want to see dogs killed by wolves or other wildlife, and would understand the desire to attempt to save a dog, owners must be encouraged to take some personal responsibility for the safety of their pets. We understand that the long-term persistence depends on carefully balancing the complex biological social economic, political aspects of wolf manage. But we are concerned that a small number of especially vocal members of special interest groups are dominating the "human dimensions" aspects of wolf management strategies in this state. We agree that legitimate concerns about wolf depredation on livestock and the associated economic losses must be addressed. However, an outright opposition to predators by some individuals in Montana has been driven primarily by unwarranted fears and exaggerated claims about the effects of wolves on livestock, human safety, and other wildlife populations. These unfounded claims should not be used to justify recreational hunting or trapping, or liberal lethal wolf control for the sake of protected livestock without first attempting all feasible nonlethal methods.

L0263: I would like to see a population of wolves maintained in Montana. I thoroughly enjoy seeing and hearing the wolves in the Sun River drainage. I like the fact that they wandered in on their own. It means more to me to hear and see the North Fork Sun River wolves than those in the overly managed Yellowstone ecosystem. I also enjoy hunting elk and observing elk. I realize the importance of maintaining elk herds in Montana for the money hunting brings to the state but I do think wolves and elk can coexist. What might have caused the decline in elk numbers? Could the elk's movement patterns have changed due to the presence of wolves?

L0301: We do not want or need any wolves introduced in out county, Petroleum. Please list the wolf as a predator which it is. The Fish and Game have enough trouble trying to manage wildlife in our county. They are understaffed and overworked. Please do not put any more on them or us as citizens in this county.

L0314: I am in support of the wolf reintroduction program as well as wolf management in the state of Montana. I would like to see this handled scientifically and not ruled by emotions. It is our job to do the best that we can with keeping the wolf as one of our state treasures. I also think that an advisory board needs to be set-up of ranchers, hunters, citizens, government agencies, animal environmentalists and etc. to advice. If cows, dogs and farm animals can be compensated then I believe that our state treasures, deer, elk, moose, wolves, cougar and etc. can also have a high rate applied to them and when they are poached then that rate along with any other fines would be given to the poacher to pay. This flat rate would then be put back into FWP funds for protecting our out of doors as well as compensation for when a farm animal is taken by a wolf. Rule this rationally, legally and scientifically. Let us all benefit by keeping wolves in our state and set an example for other states to follow. Keep wolves in Montana.

L0325: Wolves should be given the greatest protection possible and populations allowed to grow until they reach a natural carrying capacity for the state and region. Wolves should not be hunted due to the disruption this will cause to each pack's social structure. MTFWP states that wolves should be managed just like mountain lions and black bears. However, this is not what you are proposing. It appears that you are not going to let wolves grow in population size until they reach an equilibrium with their environment, which is what lions and bears are being allowed to do throughout the state. Instead you are proposing to keep a minimum of 15 breeding pairs. This is inappropriate. What you mean by managing wolves like bears and lions is that they can be shot and killed. In order for wolves to be managed like other big game in the state they must be allowed to grow to a natural carrying capacity and then strictly regulated to ensure continued population growth. Whether or not wolves affect big game populations they should be encouraged to expand their range into all habitats of Montana. Wolves and other predators are important and vital components to functioning ecosystems. Hunters fear that wolves will cause big game numbers to decline, but this is exactly what many people around the state and MTFWP are managing for, so wolves should be greatly welcomed to expand and potentially reduce big game numbers. There is great opposition to wolves in this state form many citizens, but there is also great acceptance and understanding for wolves by many people in Montana and around the USA. But just because the power is shifted to the states does not mean that you have to bow to the irrational wishes of many vocal opponents of wolves. MTFWP should manage wolves so that they can flourish in number and once again hold their title as a top predator throughout the state where they number into the thousands and contribute migrating individuals across our borders.

L0337: I live on a family ranch in Petroleum County. I feel if wolves were allowed in this area it would have a devastating effect on my family and the rest of the people in this area. There is an abundance of wildlife and wolves would create uncontrolled havoc in the wildlife numbers. Agriculture is the main source of income. The loss of livestock would make tremendous hardship on the people of this area. The loss of wildlife would also be a hardship on many people. I do not think wolves should be allowed in this area. I do not support any amendment that allows wolves.

L0349: 1) Leave the wolves alone. You can see cows in Kansas. 2) Leave the wolves alone. You can see cows and sheep in Illinois.

L0352: 1) None of the alternatives are acceptable, #4 would be the minimum. The least wolves the better. They are decimating our wildlife in record numbers. They weren't endangered in the 1st place. It was just a make more government jobs. Why don't you represent the hunter and fisherman who pay over 62% with their license fees? If there were too many elk in the park why not transplant them to other areas, like the Flathead and Bob Marshall? You would've been backed 100% - but no - you didn't stand up for our rights just your jobs! 2) Pay compensation to rancher, full market value for the size of animal would have sold for when grown. Make the wolf lover pay the bill. Maintain a hunting/trapping season. Keep the feds out and do your own management. But Feds should pay most of the costs - it was their program to start with and crammed down our throats. Please stand up for our wildlife and the people who are paying your salaries. Show some guts and tell them to take the wolves back east someplace if they love them so much and kill out their wildlife.

L0354: 1) Alternative #4 minimum wolf is best. Why? 1-less wolf-livestock conflict. 2-less wolf-human conflict. 3-federally funded versus sportsman's dollars. 4-decreased predation of big game herds ensuring stable big game license sales. 5-decreased stress on big-game herds on winter range at the end of a harsh winter. 6-better protect sensitive ungulate populations of bighorn sheep and moose. 7-increased recruitment rates due to higher calf, fawn, and lamb survival rates. 8-increased hunt opportunities, outfitter business, and other economic benefits. 2)I support the position of the Montana Shooting Sports Ass. Concerning the wolf management EIS. It is imperative that MFWP adopts a plan that represents those groups who have born the costs of wildlife conservation in this state -- Montana's hunters and stock growers. The final plan. Most similar to alternative 4 minimum wolf, must reflect the intent of our state legislature and be consistent with HB262, HB306, HJ32 and SB209 and preserve Montana's hunting heritage.

L0012: 1) I believe the contingent plan should be the adopted plan. Why the big hurry to delist? I am afraid we will undo decades of work to reintroduce them in a scant few years and we'll be back where we started. Why the hurry? So we can have open season on wolves? Also this way the federal gov't pays the majority of the costs. 2) Just make sure the state has major input and that ranchers do have flexibility in protecting their herds.

L0013: 1) I support alternative #3 which allows for the maximum number of wolves, nature has a glorious value in and of itself, we must wake up to this fact. 2) Need a compensation program included. Trapping is a cruel method of control and should not be used.

L0112: 1) I prefer alternative 1. status quo. Wolves are just recovering and we need more than 180 in the entire state. Let's put aside our anthropocentric greed and let other species flourish. Ours is the only population rampantly out of control. 2) I would modify this alternative to add state/federal reimbursement for losses due to predation though were we to choose this alternative, Defenders of Wildlife would continue their funding. Lets share the planet, and one of the few places we have left.

L0142: 1) Sirs, I feel opinion of the majority of Montanans was not heard by USFWS and MTFWP regarding wolf reintroduction, conservation and management, livestock operations and how we manage stock is now changed forever. Wildlife populations, numbers we have all cooperated with enhancing, will begin to diminish. Back country users will be injured, killed or removed from public lands because of the agency's intentions and mandates. Wolves do cause livestock loss and damage. Wolves are killing wildlife. Wolves will injure or kill people. The preferred alternative, as described is positive. The bigger question in my mind continues to be "is there a place in Montana in today's society for introduced wolves? From my perspective with all impacts of this animal considered I say no.

L0151: It is clear to me that FWP has thoughtfully attempted to balance the contentious issues surrounding support for a viable population of gray wolves, conflicts with livestock, human safety, and long term funding for wolf management. I am impressed with the comprehensive nature of the preferred alternative. In particular, the long-range objective of building public support so as to preclude the need for either artificially capping wolf numbers or define their distribution throughout the state is greatly appreciated. Willingness to allow wolves to strike their equilibrium within the system reflects the progressive nature of the alternative. Whether 15, 20 or 100 breeding pairs are used as the trigger point for toggling management actions, that trigger will only be as good as the FWP commitment to advocate on behalf of this species. Given the national interest surrounding gray wolves, I believe it is entirely appropriate for the federal government to continue to provide financial support for Montana's wolf program after delisting. This support should continue for as long as it is needed to properly manage wolves in the state.

E13: 1. The best alternative is #2. This plan was written by a diverse group of Montana citizens with considerable input from others interested in the situation. Montana needs to be able to manage the species not the feds. 2. No.

E3: 1. I would prefer no change since the wolves would still be protected under ESA. Yes wolves have returned but they should be protected and respected. Putting wolves in a bigger cage limiting how they live and culling them does not make wild wolves. It would be nothing more than a bigger petting zoo. And if this sort of activity were done to humans it would be banned immediately for being cruel. Wolves have every right to live on this world as much as humans do and that should be honored. 2. Science needs ethics so I would love to actually see these changes to the No Action alternative and the others too. If there was No Action the FWS shouldn't run it. They are already in league with the ranching community that wants them dead and have already killed many wolves. Non lethal methods when dealing with wolves in livestock depredation incidents should be made into law. And the wolves should not be killed. Relocation wolf sanctuaries tranquilizing wolves to relocate the ones that come near cattle are an option without killing them. Humans have nothing to fear from wolves but humans should fear humans all the more.

E21: 1. I am the owner of 50 acres in the North Fork of the Flathead River Valley. I am in favor of the preferred alternative because it provides flexibility to manage wolves over time and keeps control of the management process in Montana. I feel the preferred alternative is balanced and does not favor any one particular group. Thank you for your efforts to resolve these important and contentious issues. 2. I would like to see a better measure of wolf populations than number of breeding pairs. In this respect I think Wyoming's definition of the number of packs would be a better measure.

E38: 1. I believe that protection of the wolves is one of the most important issues facing our state. I support the additional wolves plan. It is our responsibilities to protect all wildlife this includes predators. We have more than enough cows and there are agencies that will reimburse the ranchers for the loss of livestock. If we don't save and protect these animals who will? 2. I believe that anything that we can do to increase the chances of wolf survival are most important and to me that means increased numbers. Thank you for reading this.

E41: 1. Wolf Management Position When there is a problem between a rancher and a wolf trap and move the rancher! Move the farmer! Move the suburbanite! Stop the development! Draw the line! This is a last opportunity to preserve renews and maintain national treasures: True wilderness and the wolf. There are only some last vestiges of true wilderness capable of supporting the wolf and other major predators so preserve them. Wolves and other predators should have rightful place in those wilderness areas. I think that we all need it truly wild places even the vicarious pleasure of knowing that they are there. The last wild places belong to all citizens not just local ranchers and farmers and hunters. National parks forests and game reserves are a national treasure not just a local or state treasure. The federal government Fish Wildlife and Parks should maintain control of wolf management. The states have a dismal record of protecting wildlife. Wildlife particularly predators under the control of stockgrowers and hunters' is outrageous given their history of annihilation or push to a fringe existence of near extinction. Wildlife in national forests federal lands parks and reserves belong to the nation not the states and not localities. Ranchers and farmers know managing the land in the sense of feeding stock and planting not managing wildlife. They have to be bribed or paid to do that. What Montana has to offer some true wilderness is an economic boon to the state. It attracts tourism hunting and those who want to live in such a state. Most other states have already blown it under the same mentality of stockgrowers farmers developers foresters a mentality that argues for everywhere being as safe as a city park. The mentality that argues against wolf existence is an old one of entitlement power and control self-centerness concrete thinking anger fear hysteria manifest destiny (entitlement) and anthropocentric. The arguments that force and back wildlife into the fringes particularly predators out of existence are old and irksome: Development another blade of grass for stockgrowers being at the top of the food chain for hunters they are a threat to those nearby. I think that the line has to be drawn at the boundaries of national parks forests reserves and federal lands in the areas where wildlife has a foothold. Those who live nearby whether suburbanites ranchers farmers or others have to tolerate the wildlife and not infringe further. We have taken enough! We have raped and rampaged the land to the edge of the last 2-3%! And we are arguing about that. Those who want to wipe out the last of it can move to the other 98% that is safe for them. Farmers and ranchers can be reimburse for expected losses. Hunters can have another animal to occasionally hunt and otherwise tolerate as part of the wildlife system--they want to be in the wild and have a

primordial experience don't they--or do they just want to guide to point out a critter and say shoot! On the fringes it belongs to wildlife to the predators to the wolf. We visit we play in their area we live nearby; then we tolerate take the risks or don't go there don't live nearby. By the way my father is a rancher. I am a hunter. I have been a horse rancher. It is a much better world if there is room for us all. 2. FWP should maintain indefinite control. The population should be allowed to be larger--186 wolves way too little. There should be no shooting allowed by ranchers or farmers only wildlife managers for control purposes. The emphasis should be on reimbursement for stockgrowers and farmers rather than kill permits. Hunting should not be permitted even special hunts. The states stockgrowers farmers outfitters should have no hand in management. This is a national treasure not a local or state authority. Wildlife especially endangered or threatened species belong to the nation even if they are on rancher farmer suburbanite land

E44: 1. First of all one thing needs to be clear what the whiney cry-baby ranchers want has to be the last thing we are concerned about. They want one thing to be able to shoot any wolf on site. Wrong! If they find themselves in financial trouble we need to say go get a job at safeway. This is the same thing that everybody else is faced with. Wolves may need to be managed but I don't any of your options are no target. Outfitter's interests need to be the next lowest concern. If they don't like it tell them to go back to wherever it is they came from and if they are from here we need to tell them we don't owe a living. I love ELK and have hunted them my entire life. I also like wolves and having them in this state. If the ranchers get their way (and they will) wolves saga will be over. 2. What the ranchers and outfitters really want is an open season on any wolf they see. That is flat out wrong. They will probably get this done but that is still wrong. Maybe now this is just a thought for every wolf a rancher shoots they owe me \$ 10 000 because that's what it's worth to me to see one. Sounds fair to me.

E45: 1. NONE. FWP has failed to address the problem and impacts of wolves on Montana big game species. I submitted 7 pages of comments last year on the so-called 'conservation plan' and participated in the Butte meeting. Every comment was ignored. Your Department is only listening to the pro-wolf people and it is a disgrace and you want the FWS money. You might as well stamp U.S. Fish and Wildlife Service on your plan. Are we to be led to believe the DROUGHT is killing calf elk in YNP? We will reduce special permits to feed wolves we don't want?..Get real! FWP must think we are pretty damn stupid. You need a new Director like Frank Dunkle or Wynn Freeman and your job should be fish and game management not endangered species. Most all of the wolves are out of the so-called recovery area so how do you justify that? Your E.I.S. doesn't even consider big game and is a Dept. of Livestock E.I.S. so why didn't they write it? ...a big joke!! Do you accept photos? I have the perfect photo for your E.I.S. Director Hagener doesn't have a clue!! 2. DROP the entire program and get serious about game management and stop wasting sportsmen's dollars on this crap!

E51: 1. The only alternative that will protect the wolves is one in which management of the wolves is under FWP alone (NO Montana State control!) and that would continue the protection of the wolves as an endangered species. 2. I do not think the state of Montana can be trusted to manage the wolves in a manner that will provide any protection to the wolves at all. Rather the protection safety needs or value of the wolves would almost assuredly run a distant LAST in any and all instances where a decision between wolves or cattle/ranchers would need to be made. Montana state elected and appointed officials do NOT have a good track record in their concern for wildlife or wilderness or anything concerning environmental issues in general for that matter. Nor do they respect the will of the people unless it supports what they intend to do anyway. So even though public support for the protection of wolves has been shown to exist it would have little or no impact on actions the state would no doubt take to jeopardize the wolves existence. Within a short time the wolf population would dwindle and then be no longer viable as one by one wolves would be murdered as a result of supposedly becoming a predator to cattle sheep or? The wolves are needed; they are an important piece of the natural balance of wildlife but to continue to thrive continued protection from human predators is needed. Please do not give ANY control or voice in the matter to the state! Thank you.

E64: 1. I am a native of Montana and as such am deeply concerned about protecting the forests and wildlife of Montana. I strongly oppose de-listing wolves and having Montana manage wolves for the following reasons: 1) I do not believe that wolves have had enough time to establish themselves. There needs to be more breeding pairs and there needs to be a better political climate (meaning more receptive) before delisting. 2) Although it is clear that wolves are making a comeback in Montana it is not clear that wolf habitat is improving. A lot of habitat is hanging in the balance--especially with the policy direction of the Bush administration. Before delisting roadless areas that are not protected need to be secured. Additionally there needs to be improved migration corridors between existing wolf populations to avoid genetic isolation. Finally more needs to be done to remove livestock from areas that wolves frequent. Until all these things are accomplished wolf habitat will not be good enough to sustain a de-listed wolf population. 3) For decades wolves were subjected to persecution in the lower 48. It has taken a lot of money and effort to begin reversing the damage. It would be foolish to risk losing the gains made until there is more certainty that the gains will not be lost. 2. Increase the number of breeding pairs to 200. Is that an arbitrary number? Of course! But so is 10 15 and 20. Montana is a big state--quit being so damn miserly with your benchmark numbers!

E80: 1. My wife and I have visited Montana and the Greater Yellowstone area 6 times in the past 12 years and intend to return. Much of our interest has centered around the abundant wildlife; wolf reintroduction has been a big part of that interest. The research that we have seen so far strongly supports the position that wolves are a keystone species in the area and that the ecosystem (not to mention the economy of Montana) is much healthier as a result. As such we urge you to keep this in mind as you consider delisting the wolf. While we would prefer not to be tied to a specific alternative we wish to suggest the following points. 1) The program's funding needs to be assured before delisting is considered. 2) There needs to be clear guidelines on when and under what conditions wolves can be killed. 3) Since so few cattle are actually killed by wolves we recommend that Montana pay for such losses. While this may sound unwise, consider that much of the recent increased interest in Montana is driven by the excitement of wolves being reintroduced. I strongly suggest that the value wolves have for your economy strongly outweighs any reimbursement cost for lost livestock. 4) Wolves should be managed as you manage other wildlife. That is there should be no artificial limits put on wolf populations. Rather they should be allowed to fluctuate in tune with the environment. Thank you for the opportunity to comment on the wolf recovery EIS. We urge you to do what is right for the ecosystem wolves and Montana's economy and not what may serve the short sighted goals of some entrenched interests. I can assure you that our interest in Montana will be greatly diminished if wolves are not allowed a place in Montana's ecology. 2. see my comments above

E2: 1. To whom it may concern This comment is on a few concerns about the wolf conservation one for what I study about wolves is that they are more likely to run from a human than to attack. And also us the people have no right to decide if the wolves or any other animal should be murdered! The wolves and other animals were here before us and they should be here after us. Their lives are much more harder than ours we do not have to hunt and risk our lives for food protection everyday they are worried if some dumb human is going to hunt them down for fun or pleasure! I have a little bit of Native American blood in me to which is why these majestic wolves are so important to the world and ME! I am not an adult but I am a human to which I would love to see the wolves protected. From this day forward. Wolves have a family unit just like ours a mother a father brother and sister's grandparents and so forth. How would you like it if you were the wolves and they were you? You may not listen to other people or even me but do me a favor Listen to the WOLVES their song at night what will the Mountains and forest be without their song that has been around for ages? Think about that and think of the people and me who love the song of the wolves. The Wolves and I thank you for your time.

Administration

Summary of Comments: These comments address state and federal responsibilities, the current legal status of wolves, their recovery, the federal and state delisting processes and the progress of planning efforts in Idaho and Wyoming. Some comments support wolf delisting and state management. Closely related comments mention concerns about impacts to Montanans if delisting is delayed much longer. Other comments oppose delisting and advocate continued federal management. Some comments suggest that USFWS has not satisfied the legal requirements of ESA. Other comments prefer that wolf recovery efforts be terminated altogether and that wolves are removed from Montana. Still other comments suggest leaving all wolf management up to private landowners. Some comments support the involvement of USDA Wildlife Services in resolving wolf-livestock conflicts while other comments oppose WS involvement. Some comments want FWP to coordinate wolf management with adjacent jurisdictions (e.g. Indian tribes, the states of Idaho and Wyoming, National Park Service). Several comments say that actions taken during the 2003 Montana Legislature establish new sideboards to a state wolf management program. Some eastern Montana counties passed resolutions “prohibiting the presence, introduction, or reintroduction of any animals which pose a threat to public health, safety and livelihood” of their citizens. Some comments indicated a preference for an annual interagency/public workshop instead of a standing wolf advisory council.

Response: While the restoration of wolves in Montana occurred through the combination of natural wolf recolonization and reintroduction, the population in the tri-state area has attained the biological benchmarks of species recovery according to USFWS. The question addressed through this EIS is how a recovered wolf population will be managed and by what agency or jurisdiction. Whether USFWS has satisfied the legal requirements of ESA is not for FWP to decide. However, the No Action Alternative does present a scenario in which USFWS continues to manage Montana’s wolf population. FWP’s preferred alternative (Updated Council) would have FWP assume conservation and management responsibilities for wolf management in Montana when USFWS completes the administrative steps to delist the wolf from ESA protection. Both the Council and FWP recognize that managing wolves will be controversial and challenging. FWP is aware that there is distrust of its intentions, given the highly controversial aspects of the public and political debate surrounding wolf recovery and management. However, FWP and the Wolf Management Advisory Council have been very explicit in stating their intentions and commitment to maintaining the restored population and integrating it into Montana’s wildlife heritage.

Montana’s statutes charge FWP with wildlife conservation and management responsibilities. Whereas FWP may have limited experience with wolves at the outset, it has confidence in the professional capabilities of its staff to learn and get up to speed quickly. In fact, some staff are gaining experience managing wildlife in the presence of wolves and by default their knowledge and experience increase. Montana statutes charge both FWP and Montana Department of Livestock (MDOL) with resolving conflicts and damages to private property caused by wildlife. Therefore, MDOL will be involved in wolf management in Montana either directly or indirectly. Damages caused by other large carnivores (e.g. mountain lion, black bear) are handled by USDA WS through a Memorandum of Understanding between FWP and MDOL. The preferred alternative would have FWP contract with WS to address wolf-conflicts through MDOL. In a proactive manner, FWP, WS or other organizations will also work cooperatively with livestock producers with an increased emphasis on proactive efforts to reduce the risk of livestock conflicts. Examples are extra fencing, additional guarding animals or herders, or pasture trades which could reduce livestock vulnerability during certain key times. If conflicts do occur, WS would respond to landowner complaints, conduct field investigations of damages, and carry out control activities for problem wolves. FWP has noted the concerns about WS involvement expressed in some public comments. FWP envisions the resolution of wolf-livestock conflicts as a very interactive endeavor where the two agencies would be working in concert and with livestock producers, but FWP has the ultimate responsibility for determining the disposition of wolves. Actions by WS and FWP will be guided by the incremental approach described within the context of adaptive management. Details are provided on pages 76-82 of the Draft EIS. In those counties where there is no USDA WS agent, FWP will coordinate with the local county authorities. FWP will begin working on these Memorandums of Understanding when this EIS process is completed.

The preferred alternative stated that FWP would coordinate with other agencies and jurisdictions on topics of mutual interest. This would include federal agencies, the states of Idaho and Wyoming, Indian Tribes, and non-governmental organizations.

FWP is aware of and sensitive to the concerns expressed by eastern Montana counties about the potential for impacts to livestock producers and local prey populations as well as human safety if wolves become established. While state laws supercede non-binding county resolutions in much the same way as federal laws supercede state laws, FWP believes the concerns can be addressed and alleviated by the preferred alternative. So long as the number of breeding pairs in Montana exceeds 15, FWP has flexibility in management options without artificially “zoning” wolf distribution, particularly in areas that are primarily mixed ownerships, private lands, and agricultural. See the preferred alternative in the Final EIS for an in-depth description of the management tools that could be available to FWP and livestock producers.

The 2003 Montana Legislature passed several new statutes that have potential relevance to wolf conservation and management in Montana leading up to and upon delisting. HB 283 directs the Montana Attorney General to analyze the state’s options related to delisting and, in cooperation with FWP, to prepare a proactive legal opinion for possible litigation on recovery of damages and costs incurred by the State of Montana that are associated with wolf reintroduction. The Attorney General’s Office and FWP have already been in communication. HB 306 is an act submitting to the electors of Montana in November 2004 an amendment to the Montana Constitution recognizing and preserving the heritage of Montana citizen’s opportunity to harvest wild fish and wild game animals. FWP does not foresee any conflict if the electorate passes this proposed amendment. In fact, if it does pass and if Montana’s wolf population increased to the point where population regulation through hunting and trapping became appropriate, these activities would be incorporated into that heritage as well. SB209 requires FWP to publish an annual game count, estimating to the department’s best ability the numbers of each species of game animal in the hunting districts and administrative regions of the state. Under the preferred alternative, FWP proposes to have an active public outreach component in the overall management program, including preparing annual reports, making information available through FWP’s website, giving presentations to interested groups etc.

HB262 describes legislative intent concerning FWP management of large predators. FWP and the FWP Commission must interpret HB262 within the context of other specific legal obligations and statutes that FWP must comply with, including the conservation and management of wildlife in such a manner that prevents the need for listing (MCA 87-1-201, MCA 87-5-107). State law also guides the FWP Commission (MCA 87-1-301). FWP believes that once it has met its legal requirements to maintain the recovered population and the population is secure, then it and the FWP Commission will be able to exercise some discretion while implementing wolf management through the adaptive framework of the preferred alternative. FWP does not believe the preferred alternative conflicts with HB262 because the preferred alternative describes a proactive approach to integrating the management of predator and prey populations to maintain traditional hunting heritage and wildlife viewing in Montana. The preferred alternative also contains specific provisions for agency personnel and private citizens to protect themselves if threatened and their domestic dogs if attacked and for citizens to protect their private property if a wolf is attacking, killing, or threatening to kill livestock, according to legislation (SB163) already passed by the 2001 Montana Legislature. These three primary goals identified in HB262 are also guiding principles underlying the preferred alternative which can be traced back to the work of the Montana Wolf Management Advisory Council and their *Report to the Governor* submitted in December 2000.

HJ32 is a non-binding joint resolution requesting that the Governor, the Montana Congressional Delegation, and the US Secretary of the Interior seek the immediate delisting of the gray wolf. USFWS, the Governor, and FWP all agree that the gray wolf population in the northern Rockies has recovered and can be delisted. HJ32 urges the Governor and FWP to seek federal funding for wolf management. The federal government has already provided funding through the State Wildlife Grants program and through USFWS to help Montana prepare for wolf management. The Governor and FWP continue to work with officials in Idaho and Wyoming and the tri-state Congressional Delegation to secure adequate, long-term funding. HJ32 also urged FWP to adopt a certain definition of “breeding pair” that, in part, would have FWP determine whether or not a pack counts as a breeding pair when pups are six months of age. The definition suggested by HJ32 in one respect is more conservative than the federal recovery definition, which when implemented, has allowed for the replacement of alpha animals if one of the biological parents of the litter is killed and another adult (male or female, respectively) is present or joins the pack and the pack is capable of breeding the following year. USFWS has documented this and counted the pack as a successful breeding pair on at least one occasion. In addition, it is difficult to count and classify wolves without adequate snow cover using either aerial or ground tracking methods. FWP’s preferred alternative outlines a definition that is consistent with the federal recovery definition. ESA requires USFWS to oversee state management for at least five years to assure that the wolf population does not decrease to the point of requiring ESA protection once again. FWP and the Wolf Council believe that monitoring and counting breeding pairs according to the federal definition will be useful for data comparisons and important to document. HJ32 also called for the federal government to abandon authority over wolves in Montana upon delisting. Indeed, upon delisting the authority and

responsibility for wolf management falls upon the State of Montana and FWP. USFWS will maintain some oversight, primarily through interagency administrative coordination, as required by ESA, for at least five years. Even during that oversight period, state laws guide state officials. Lastly HJ32 urges the Montana Attorney General to join into any lawsuit filed in opposition to federal delisting. While this direction pertains to the Attorney General's Office more directly than FWP, FWP is already working with other western state fish and wildlife agencies and other states' legal councils in anticipation of litigation.

FWP does not believe that the preferred alternative conflicts with these new actions by the 2003 Montana Legislature or any other state laws or administrative rules. On the contrary, the direction established by the preferred alternative is the most consistent of all the alternatives. In it, FWP will meet its legal requirements to maintain a secure, recovered population, comply with state laws and Commission policy, integrate the wolf within Montana's wildlife heritage, while at the same time lessening potential negative impacts to those most directly affected by wolf presence.

Whereas the original Wolf Management Advisory Council was appointed by a former Montana governor and this group alone made recommendations to FWP, their meetings were open to the public as per Montana's "open meeting" law. Members of the public in attendance were provided an opportunity to speak or submit written comments. While the preferred alternative calls for a standing advisory council, members of the public will still be able to attend and provide input. FWP also expects to have a regular presence at various stakeholder meetings to exchange information and foster working relationships with all interested parties. In addition, FWP will be available to attend meetings and workshops at the local level, whether county commission, local grazing district, rod and gun club, or conservation organization. FWP is certainly not opposed to the annual workshop concept described in the other alternatives, but is not committed to establishing that as the primary means to collaborate with stakeholders at this time. FWP could still hold a workshop even with the establishment of a standing advisory council.

Representative Comments:

W12: I do not like to see federal government taking control of Montana resources. I would like to see the state take over.

W18: I want state/local folk to be able to take more control. Not federal government.

W23: I like the idea of the state controlling problem wolves.

W26: What definition of threatening will there be?

W53: I like alternative #2, but I am concerned about why then would be removed from the state list, then after that, what protection would they have?

W94: Adaptive, local management is important.

W98: Seems likely that there will be a lot of delays. What will come after the delays?

W110: Support delisting and state management.

W113: Rather have state officials responding to conflicts because they will be sensitive to local people/issues.

W120: Grazing on federal land, federal and state managers should handle conflicts there. Problems handled with aversive conditioning first before animal destruction. Maintain close to federal penalties for poaching or illegal taking.

W122: Wolves should have equal right to take wildlife as any hunter. Strict, evaluated poaching penalties. Fines should be higher than other species due to low numbers. Less compensation for livestock losses on public lands.

W190: Emphasis on non-lethal methods. Would like to Wildlife Services excluded from this whole process. People who are managing the populations should be doing the on-the-ground work.

W195: FWP should manage. Under alternative #4, with FWP addressing local concerns.

W211: CMR should be included in same rules as other lands in Montana.

W226: Management should be by state (FWP).

W282: Wildlife Services – will they be prompt?

W286: Does any alternative remove the federal government?

W321: Ask Wyoming for special session.

APPENDIX 5

W334: Too much money is going to administration and not enough to the on the ground problems.

W351: Leave it up to the landowners to manage.

W357: Who is going to pay for the lawsuit, once the wolves are delisted and when the anti's file suite to keep the wolves listed?

W369: Federal dollars bring federal control. That's a problem.

W434: Federal government should be responsible for wolf management. It's expensive to fly helicopters. Wolves will have our wildlife. Need some local control.

W450: Feds have no credibility. Don't want wolves, but federal management is not an option. Alternative #2 with amendments.

W480: On all budgets (all alternatives) some of the \$800,000 b8dget needs to be reapportioned to Wildlife Services – more needs to be allocated to Wildlife Services.

W481: Are the other two states doing what Montana is doing? It's important to be compatible.

W505: Local control essential, referring to state level. Once there is a recovered population, mockery of the ESA Law if it is not delisted and managed.

W509: Delist as soon as we can.

W528: If we use private funding sources would involve private interests; should be public funding; want people of Montana, Idaho, and Wyoming to have the most say; should be state funding only.

W544: I prefer Alternative #2. Stipulations – 1) need seven regional wolf specialists 2) to support this need to raise hunting licenses 400% 3) Until that time, feds need to pay 100%

W586: Very important for state control.

W576: Regulation can be achieved the best by system overseeing Montana, Wyoming and Idaho to make sure there's an effort across state lines with federal funding.

W674: State needs to handle our wildlife. Does a good job with management.

W755: I feel the wolf can be delisted right now, but should not be due to the fact that Wyoming does not have an adequate plan.

W759: I don't want to see Montana Department of Livestock involved at all. Don't include interstate breeding pairs in the total count.

W784: Question: Is the state of Montana going to assume liability (when wolves get on my ranch)?

W786: Needs to be more defined who is liable, and who will pay.

W797: I feel they need to be managed by state, not federal government.

W808: I like the idea of state doing management program, and have the feds take care of the additional expenses.

W828: I'm thankful they're involving Wildlife Services.

W831: Why is FWP stuck with this plan when they already have enough to do?

W851: I am concerned that the legislature will take over wolf management from FWP.

W852: Montana Legislature has done well in protecting Montana's interests in managing wolves.

W862: It's important that the public remain involved in the process.

W874: I want to see an accurate history from FWP on wolf history.

W890: I feel that public comment on the EIS had no effect on what was printed last year.

W902: Local people should have say and control, not the state or the feds.

W911: I am concerned about litigation for getting wolves delisted.

W934: Get under state control – the sooner the better.

W976: I could see a real advantage to FWP managing – to respond to a problem – I could call FWP and a game warden would be up there.

APPENDIX 5

- W977: If Wildlife Services is going to continue, they need to get more people in the field.
- W980: Who know how long the Federal Government is going to take to delist them.
- W986: From what I hear, it's going to be better to have them under state control ... if you don't have the funding are we better off where we are now?
- W991: If it's going to take 2-5 years – I feel we need to see progress before they're delisted.
- W1002: Respond to livestock conflicts – FWP as well as Wildlife Services should respond to livestock conflicts. I would like to see FWP respond.
- W1027: If Wyoming doesn't fall into line, wolf will never get delisted.
- W1028: Don't think FWP should manage – they didn't create the problem. If they do, get federal funding.
- W1035: Currently staffed people will get spread thinner and will end up with less accurate data.
- W1081: Montana residents need to have say in what tool (trophy permit) will be used to regulate numbers/ option with best economic benefit.
- W1086: Don't listen to nonresidents. You work for the residents of Montana.
- W1110: Funding and personnel needs to be addressed to adequately manage a wolf harvest.
- W1150: Montana needs to get involved now.
- W1151: Problem with contingency plan is that it is under Federal management
- W1152: Consider HB 283 ... inactivity is a killer; it costs more \$ the longer we wait.
- W1153: Q. What is the feasibility of the contingency plan; if other factors keeps the status as endangered. Let's do it if the USFWS will accept our plan, regardless of which plan (wouldn't have to the contingency plan) – ie get the federal government element out.
- W1172: Likes state involvement, but we have to pay.
- W1184: Paranoid about the good old boy's in Helena relative to handing wolf management over to the state (political concerns) ranging from the governor's office to the legislators.
- W1190: Move on with this business.
- W1220: One general statewide plan will not work for all areas.
- W1221: Need to implement some sort of wolf management now as the wolf population and pack numbers continue to grow.
- W1231: Don't want FWP to stall anymore. Want Montana plan implemented ASAP.
- W1233: What is FWS role in responding to conflicts?
- W1241: Lack of trust for Washington DC – keep in the hands of the state. No matter what alternative, keep feds out.
- W1245: If wolves are delisted, would that require an increase in FWP personnel?
- W1272: Any hunting or killing of wolves needs to be done by FWP officer, or trapper/ADC.
- W1289: Alternative #2 – federal or state officials respond to livestock issues.
- W1294: How are we going to get by the judges?
- W1312: State management will maintain stable populations.
- W1321: How will FWP address manpower/time issues?
- W1359: Must get wolf delisted so we can move on. Concerned if Wyoming will hold it up for others.
- W1360: Livestock conflicts – all alternatives need to better define when things happen – when you can harass, shoot, etc. How close is close? How threatening is a threat? Use examples to help define.
- W1367: Regarding #3, State of Montana officials should also respond to conflict situations.
- W1369: State officials should respond to problems with federal funding to pay for it.
- W1378: Regarding #4, encourage state in their management to stand up for their rights and follow state law regarding predator control.

W1384: Concerns about biologists work load – not in the field to monitor ...

W1402: Keep ranchers in mind – keep paperwork and time to a minimum.

W1403: Need faster response to reported kills by wolves -- without makes document difficult.

W1424: If the “greenies” decide to sue because of delisting, who do they sue and who pays the bill?

W1442: Funding ... how is that determined. What happens when program funding is cut? What happens to the program?

W1468: Plan more complicated and expensive than it needs to be.

W43: 1. Must have a plan acceptable to the feds or they won't delist. A lot of good folks have done good work here. 2. Emphasize need for permitted lethal control. This is the only way to gain their respect and make them avoid humans and livestock. Acknowledge that a pred-prey cycle exists and don't overemphasize population controls. Emphasize wild habitat. Try to talk some sense into Wyoming or delisting won't occur.

W50: 1)I would suggest a split between 2 and 4. I would like the minimum number of wolves with the least control by USFWS. I would lean toward #2 if necessary to keep USFWS out of the loop. Best spend all time on #5 because the lawsuits will stop them from being de-listed. 2)We need a control on the distribution of the wolves. It does not make any sense to decimate a healthy elk and deer population. The wolves have a minimum actual cash value to Montana and the deer and elk do bring big dollars to Montana.

W55: 1)None. The local people do not want wolves here. The federal government spent millions to get rid of them. If people want wolves put them in the city, not here. 2) Eliminate them now!

W56: 1)#2. I prefer our state agency manage the wolf. I don't trust the past double talk of fed. Agency.

W63: 1)Alternative #1 Local feelings are unfriendly to wolves. All other plans have breeding pair limits that are much too low. Dept. of Livestock has an adequate compensations system. I totally oppose hunting wolves, as well as bears and mountain lions. Why waste scarce state funds when we can rely on federal dollars? 2)Nothing. More action is needed at the federal level.

W78: 1) Combination - wolf remains listed but managed based on quantity of predation/wildlife vs. cattle. FWP manages wolves, state can address local concerns. Prey management balanced with predator management, Full implementation requires funding from public and private sources. Federal officials respond to livestock conflicts under agreement with state of Montana. Regulated harvest. State and others develop compensation program. Federal rules guide response to livestock conflicts by owners/FWP.

L0149: -1)Alternative #4 minimum wolf is best. Why? 1-less wolf-livestock conflict. 2-less wolf-human conflict. 3-federally funded versus sportsman's dollars. 4-decreased predation of big game herds ensuring stable big game license sales. 5-decreased stress on big-game herds on winter range at the end of a harsh winter. 6-better protect sensitive ungulate populations of bighorn sheep and moose. 7-increased recruitment rates due to higher calf, fawn, and lamb survival rates. 8-increased hunt opportunities, outfitter business, and other economic benefits. 2)I support the position of the Montana Shooting Sports Ass. Concerning the wolf management EIS. It is imperative that MFWP adopts a plan that represents those groups who have born the costs of wildlife conservation in this state -- Montana's hunters and stock growers. The final plan. Most similar to alternative 4 minimum wolf, must reflect the intent of our state legislature and be consistent with HB262, HB306, HJ32 and SB209 and preserve Montana's hunting heritage

L0153: 1)It appears alternative #2 is the best of the ones presented. I would rather see the state manage the wolf population. The federal government only introduced them but does not properly manage them. 2)Funding is a concern. Given the current situation in this state where is the money going to come from? The federal government has to help with this. Prey management is a concern if necessary wolf numbers must be reduced, not hunting opportunities.

L0159: 1)#4 It will help all sides considered. 2)Stick to taking the wolf off the endangered species list.

L0165: I urge you to stay with plan #1 - no action. I have more faith in the feds managing wolfs than I do the state of Montana FWP.

L0189: I am writing to express my support for the no action alternative as outlined in the Draft EIS. I believe that wolves should stay on the Endangered Species List, as this status reflects the health of their population in Montana. The U.S Fish and Wildlife Service, not Montana Department of Fish, Wildlife, and Parks, should continue to manage wolves in Montana.

L0236: Alliance for the Wild Rockies supports the no action alternative. It is our position that in regards to wolves, the USFWS has not satisfied the legal requirements of the ESA.

L0258: 1)I am concerned about the number of wolves that are already here. I think the state of Montana should assume control of the population of wolves. There are dozens of them near our homes at this time. 2)I think wolves should be managed the same regardless of who owns land inhabited by wolves.

L0288: You must conform your list of alternatives to only that which the Montana State Legislature has allowed by law. I concur with the MSSA position on the wolf EIS.

L0340: 1) Wolf management should be under Montana state control only as we are the people directly affected by them. Consequently it will be more expedient to handle problems ourselves. 2) There should be NO difference between private ground and federal ground when problem wolves need to be removed. Meaning livestock producers can kill problem wolves on leased, BLM, Forest Service etc ground.

L0073: 1) None of the 5 alternatives are acceptable. 3 are absolute since this legislative session. I prefer the wolf to be a predator like the coyote. 2) Classify the wolf as an unmanaged predator.

L0101: 1) Wolf should remain on federally threatened list. Let FWS manage wolves. Let the people who study wolves have the biggest say how wolves should be managed. Let stock growers who graze on public land pay for wolf up keep. If they graze on public land, they get no compensation, that's the price they pay for doing business on public land. 2) Full implementation public and private. Livestock belong to individual and companies but wolves belong to all Americans so let the government fund the wolves. Do not pay anyone that build a home near forest and public land for their pets. If they want to live in the wild they have to accept all that goes with it.

L0119: 1) No. 2 - state run - Recognize landowners rights to make a living, recognize local areas. 2) Allow any wolf that comes near local residents to be dealt with. I believe Canada has the right policy. Their wolves are healthy, wild, plentiful and no problem to government.

L0128: 1) If the federal government wants wolves in Yellowstone Park they can manage them and pay all expenses associated. Any wolves leaving the park would be a predator.

E13: 1. The best alternative is #2. This plan was written by a diverse group of Montana citizens with considerable input from others interested in the situation. Montana needs to be able to manage the species not the feds. 2. No

E31: I support the comments and recommendations made by the Montana Shooting Sports Association. Their position is logical reasonable and balances the competing interests of man and wolf in an appropriate manner. As a sportsman who visits Montana frequently I support the MSSA position on the wolf issue. 2. I support the comments and recommendations made by the Montana Shooting Sports Association. Their position is logical reasonable and balances the competing interests of man and wolf in an appropriate manner. As a sportsman who visits Montana frequently I support the MSSA position on the wolf issue.

E33: 1. None of the alternatives is wholly satisfactory to me. Refer to the comments submitted by the Montana Shooting Sports Association for a clear statement of a better alternative. Alternative 4 is closest to my wishes. 2. Treat wolves as the predators and pests that they are whenever they stray outside wilderness areas. They should be managed by the hunters in the field and the ranchers protecting their livestock not by federal government employees.

E51: 1. The only alternative that will protect the wolves is one in which management of the wolves is under FWP alone (NO Montana State control!) and that would continue the protection of the wolves as an endangered species. 2. I do not think the state of Montana can be trusted to manage the wolves in a manner that will provide any protection to the wolves at all. Rather the protection safety needs or value of the wolves would almost assuredly run a distant LAST in any and all instances where a decision between wolves or cattle/ranchers would need to be made. Montana state elected and appointed officials do NOT have a good track record in their concern for wildlife or wilderness or anything concerning environmental issues in general for that matter. Nor do they respect the will of the people unless it supports what they intend to do anyway. So even though public support for the protection of wolves has been shown to exist it would have little or no impact on actions the state would no doubt take to jeopardize the wolves existence. Within a short time the wolf population would dwindle and then be no longer viable as one by one wolves would be murdered as a result of supposedly becoming a predator to cattle sheep or?? The wolves are needed; they are an important piece of the natural balance of wildlife but to continue to thrive continued protection from human predators is needed. Please do not give ANY control or voice in the matter to the state! Thank you.

E53: 1. Leave the wolf protected the federal Endangered Species Act. 2. I believe that delisting the wolves and handing their population management over to the state is a death threat and will guarantee their final extirpation: through allowing legal hunting of wolves as a means of lethal control.

Prey Populations

Summary of Comments: These comments address wolf-prey interactions, potential impacts of wolf predation on Montana big game populations, how wolves and ungulates will be managed, how other predators and other wildlife will be managed, and Montana's hunting heritage. Some comments reveal significant concern for real and/or perceived declines in prey populations where wolves have become established. These comments ask FWP to manage wolves aggressively to ensure that the traditional and historical levels of hunting opportunity for Montana citizens are maintained. In other words – FWP should not decrease human hunter opportunity to benefit wolves if prey populations decline. Conversely, other comments support the positive ecological role wolves and wolf predation can play on the health and vigor of prey populations; furthermore, these comments oppose aggressive wolf management to benefit big game hunters. Still other comments agree with FWP integrating management of predators and prey (as described in the preferred alternative) and encourage FWP to find a balance between predator and prey populations. Some comments say that the impacts analysis of wolf predation was inadequate and downplayed the real negative effects on deer, elk, and moose populations. Several comments pointed out a need for greater emphasis on habitat improvement or protection (wilderness designation, conservation easements etc.) due to negative human impacts on wildlife habitat.

Some comments from self-identified hunters support for wolf restoration in Montana. Others oppose wolf restoration in Montana, describing field observations of prey population declines and that recruitment has been negatively affected by wolf predation. Still others express concern for bighorn sheep populations in the presence of wolves. Comments also

question how FWP will determine the degree of influence of wolf predation on prey populations relative to other environmental factors and what data FWP will use to make such assessments.

Response: Because of their long-term financial investments and willingness to restrict themselves when necessary, Montanans enjoy relatively liberal hunting seasons for more ungulate species than other western states. Hunters in Montana are able to experience a wide array of hunting opportunities for many different species using many different weapon types and during longer hunting seasons. In addition, many different types of hunting experiences are offered through the regulatory process because of the variety of objectives with which FWP manages hunting districts. The financial investments and sacrifices made by the hunting public to restore ungulate populations are significant. This successful restoration is a significant contribution to the wildlife heritage of Montana both now and for future generations. It also enabled the recovery and restoration of large carnivores such as gray wolves and mountain lions. FWP recognizes the importance of safeguarding the investments made in both ungulate restoration and large carnivore restoration. FWP strives to balance the success and safeguard those investments.

FWP acknowledges that wolves kill deer, elk, and moose that human hunters desire to pursue and harvest themselves. Bighorn sheep appear to be more vulnerable to mountain lion predation than wolf predation due to the rocky, steep terrain that sheep occupy. In some situations and under certain circumstances, wolf predation can affect the abundance and recruitment of prey populations. In addition, prey may alter their habitat use patterns in apparent response to wolf presence – which in turn may be affecting human perceptions of animal abundance. Indeed, FWP has adjusted human hunter opportunities in some hunting districts around Yellowstone National Park, due in part to declines in recruitment and overall abundance. While a direct cause and effect relationship has yet to be demonstrated, wolf predation is thought to be a factor in conjunction with summer drought, severe winters, and the presence of other large carnivores such as bears (black and grizzly) and mountain lions. In other places where wolves exist in Montana (e.g. northwestern Montana), wolf predation appears to be less influential than winter severity. Conversely, FWP has also documented declines in recruitment and animal abundance in areas devoid of wolves. To suggest that wolf predation is the sole factor affecting prey population oversimplifies a complicated set of ecological relationships that biologists don't understand very well.

It is a speculative exercise to predict impacts of wolf predation on prey populations as if wolves and prey existed in a vacuum and were unaffected by all the other environmental factors mentioned previously, as well as habitat changes such as forest fires or human development. Wolf predation in and of itself cannot be easily isolated from all the other factors and variables affecting prey populations, particularly in the absence of very long-term, comprehensive research data using radio telemetry. FWP cannot assume that changes in prey populations are strictly due to wolves. Similarly, FWP cannot assume that changes in hunter harvest (e.g. number of animals harvested, harvest per hunter day etc.) are due to wolf predation either. Hunter harvest statistics are influenced by another set of variables, including hunter participation, weather during the hunting season, status of the prey population, changes in hunting regulations or quotas which increase or decrease hunter opportunity, license prices, hunter preferences for what is harvested etc. FWP must recognize all the sources of interactions between variables and consider the “big picture.” The reader is referred to Chapter 2 in the Existing Environment section of the Draft EIS for a more in depth discussion of wolf-prey interactions and big game hunting.

The impacts analysis for the alternatives is based on the variation in human hunter parameters (number of hunters, hunter days, and hunter opportunity for antlerless permits) because these are variables that FWP has historically measured with some degree of consistency and reliability from one year to the next. FWP also reasonably expects to continue collecting that information. FWP also collects survey data on the prey populations themselves, but these data are sometimes significantly influenced by weather conditions at the time of the survey. Nonetheless, when the two sources of information are taken together and tracked through time, trends can be detected. FWP cannot predict with precise certainty the direction or magnitude of change in prey populations, let alone attribute causes. FWP reviewed research and management information on wolf-prey interactions from a wide variety of sources and locations, including the northern Rocky Mountain states, Alaska, and Canadian provinces. Due to the wide variety of ecological conditions in which this information is collected and interpreted, FWP had to carefully consider the relevance and applicability of the results to Montana. While studying all research and management results can be enlightening, FWP relied most heavily on the work conducted in the northern Rockies, the upper midwest states (Minnesota, Wisconsin, and Michigan), and the southern reaches of Alberta and British Columbia while considering wolf-prey interactions and potential outcomes in Montana. These areas are more ecologically and physiographically similar to Montana than the natural environments in Alaska or

the northern reaches of Canada. The presence and distribution of domestic livestock, distribution of human settlement patterns, and the interspersed mountains and valleys in Montana are important differences that must be kept in mind.

FWP acknowledges that wolf predation can reduce deer, elk, and moose populations. At a localized level, prey populations may be more influenced by additive predation. Predation pressures could also exaggerate a population decline initiated by other factors such as unfavorable weather or even slow population recovery, particularly if human harvest rates of antlerless animals are too high. FWP ungulate management programs will benefit from research results from ongoing studies as well as future new studies to examine these questions. Nonetheless, the preferred alternative is based on an adaptive management model that allows FWP to adjust wolf management in concert with prey species as described in their respective plans. The preferred alternative also states that other corrective measures to reduce ungulate mortality or enhance recruitment would also be implemented.

FWP will continue to improve and refine ungulate management programs. An adaptive management framework has already been developed for mule deer and will be developed for elk during the current revision of the elk management plan. FWP will continue to collect survey information on ungulate populations (e.g. trend counts, recruitment, census counts for mule deer in representative areas). FWP has already increased survey and inventory budgets for ungulates in select areas and budget requests for the overall wolf management program also include line items for enhanced ungulate monitoring and research. FWP will rely on all sources of data and work to develop new sources of data to improve knowledge of wolf-prey interactions and the degree of influence wolves may be having.

Representative Comments:

W24: Will hunting permits be adjusted to off-set impact from wolf predation?

W25: I do not want to see more wolves killed in exchange for more opportunity to hunt another big game.

W68: Alternative #2 balances predator/prey pretty well.

W188: I'd like some kind of density threshold, where there would be a cap on so many wolves per unit area. If crossed that threshold would be subject to control of some kind. This is to maintain satisfactory ungulate levels.

W203: I don't think wolves have any ecological value in Montana, Idaho, and Wyoming. Hunters paid for wildlife and its recovery. Hunters don't view wolves as valuable like deer and elk (hunting big game). Wolves should be managed with consideration to sportsman's contributions and efforts. Hunter opportunity should come first, before the wolf.

W204: I think there are plenty of elk and deer. I don't think FWP meets its management goals on deer and elk numbers so I don't see wolves as a threat. I do think they will make animals more wary. Wolves take the sick, weak, and young. I think the wolves have a niche.

W205: I don't think there are plenty of elk and deer and cow/calf ratios are down. I think we should manage the wolf the way we manage any other predator.

W220: A couple of generations ago, there were no deer or antelope in the north country because of wolves. Wolves kept deer/antelope down on river breaks. Deer/antelope numbers will decrease dramatically if we have wolves. Alternative 4 is preferred.

W492: Alternative #2. I am not sure I agree with 15 breeding pairs. Yellowstone has a lot of prey animals but outside of the Park in the rest of the state, I am concerned with the impact to elk and deer populations. Concern that mule deer population is dwindling so what will this do to that population?

W692: It has been proved that wolves have an incredible impact. Wolves do have a place – there needs to be a balance.

W702: I support Alternative 3, but if no compensation program, there needs to be clear standards for where wolves can be harvested by ranchers and landowners. While there may be impacts on elk herds, we've seen a decline in production where there are no wolves. This can be attributed to other factors like drought.

W741: I am concerned about bighorn sheep numbers in the Greater Yellowstone Ecosystem – will wolves wipe out the sheep in this area?

W765: Most predatory animal populations will fluctuate with the available prey base.

W861: You're going to get a lot of negative comments from hunters who are losing opportunity from wolves.

W936: Some of the prey population effects is due to wolves and some is not – we need to have good information.

W1019: Protect Montana lifestyle of hunting.

W1040: Reduce wolf #s when prey species # are down.

W1051: We focus on wolves where there are a # of other factors that influence elk.

W1095: Better to have wolves eat elk than elk starve to death.

W1124: State of Montana has lost interest in state animals. #s are going down and wolf #s are going to go up.

W1186: Too much emphasis on prey animals and not enough on habitat.

W1273: Spend more money monitoring prey animals rather than wolves.

W1308: Sportsmen are paying to feed wolves; prey impacts

W1339: Predator vs. prey ... limit wolf numbers not hunter numbers.

W1447: We need hard data on predation, impacts on other predators.

W1: The more wolves we have, the less deer and elk we will have.

W20: 1. Base numbers of pairs on habitat availability. Protection is the key. Loss of critical winter range will have long-term impacts to ungulates. Predators serve to balance prey to available habitat. We should focus 10 yr attention to protect habitat. Montana can support at least 20 breeding pairs
2. Remove livestock from leased areas with a high probability of interactions with prey; allow for compensation program to be run by whom ever (i.e. private or public) There should be plenty of private funds to tap into if not , wolves are very marketable nationwide. Promote good husbandry techniques which would help reduce livestock loss to predators. Allow for a floating benchmark based on science/ research. 15-20-25

W43: 1. Must have a plan acceptable to Feds, or they won't delist. A lot of good folks have done good work here. 2. Emphasize need for permitted lethal control. This is the only way to gain their respect and make them avoid humans and livestock. Acknowledge that a predator-prey cycle exists and don't overemphasize population controls. Emphasize wild habitat. Try to talk some sense into Wyoming, or delisting won't occur.

W59: 1)#2. Current population large enough to tolerate significant control (i.e. pack removed or severe thinning in Paradise Valley, Sun River) and to significant importance elk and deer populations in Centennial Valley, Gardiner, and Beartooth Wilderness. We need to study, observe more before adding more breeding pairs. 2) Institute limited trophy hunting ASAP to increase value of wolf to ranchers, outfitters and hunters who are currently aware to the wolf.

W75: 1) Alternative #1. Due to lack of science studies to establish appropriate predator/prey ratios in given regions (biomes) 10-15-20 or whatever is an artificial number. Need more research. Gather studies or any research from Alaska, Canada, especially Minnesota, to help establish appropriate predator/prey ratios based on a given region/space. 2)I would support alternative #2 if there was no set number of breeding pairs required. Wolf populations should be based on established research/studies of seasonal/regional/prey variances. I would support #2 if all control measures were conducted/supervised by FWP. There should be no regulation by hunting/trapping.

W76: 1) #2 appears to be the most "balanced" approach. Wolves were here long before I was and will be here long after I am gone. They are truly a majestic animal, but must be regulated so as not to disrupt big game populations. Want to see hunting and trapping allowed. Thanks for the chance to comment. 2) Wolves in the Nine Mile valley don not act like wild wolves. They have been habituated to humans, thus showing little fear or concerns when encountering humans. I think that wolves attack/kill or injure pets (dogs including lion dogs, bird dogs) should be hazed or shot and killed just like livestock attacking wolves. I would like to see "hazing" allowed when wolves come too close houses, pets or humans.

W99: 1) Minimum wolf - alternative 4. 10 breeding pairs is an adequate number of wolves to assure future of wolf survival in Montana without severely damaging big game populations and decreasing hunting opportunities in the state. 2) Guarantee wolf harvest with hunting and trapping.

L0136: 1) Minimum wolf because I feel that any additional packs of predators would severely deplete game herds as well as giving government agencies the excuse to close more land. 2) I would tell the USFWS to butt out of Montana's affairs. Also public hunting and fishing license fees should not be used to fund any part of the wolf program.

L0043: I am in favor of leaving wolf management to the U.S. Fish and Wildlife Service to be protected by the Endangered Species Act. I don't think wolves should be hunted under any circumstances. They are important predators that help keep other populations of wild animals healthy. I don't think the loss of a few domestic animals justifies killing wolves. Please select the alternative in the Wolf Plan EIS that reflects these views.

L0172: This is the official comment of the Montana Shooting Sports Association (MSSA) concerning the "alternatives to wolf conservation and management" as examined in the wildlife agency's recently released "draft environmental impact statement". For the record, MSSA is the primary organization advocating the specific interests of hunters in Montana, with members in communities across Montana. Unlike some other special interest organizations, MSSA does not pretend to advocate for "wildlife", other than in the context of ensuring traditional and historical levels of hunting opportunity for MSSA members and the citizens of the state. That is, MSSA is clearly not a wildlife advocacy entity, masquerading as also representing the interests of hunters. MSSA is first and foremost an entity advocating for Montana hunters, and for continuation of traditional hunting opportunities in Montana. It must be recognized that hunting, especially hunting of big game animals, has always been a cultural imperative in Montana, and also a very significant component of the Montana economy. The economic and cultural effects of big game hunting in Montana are profound. The reintroduction and protection of the gray wolf must not be allowed to erode this cultural and economic base by significantly reducing Montana hunting opportunities. Correct but almost passing mention of this issue is made in the Executive Summary of the Draft EIS when it says: "Because of their long-term financial investments and willingness to restrict themselves when necessary, Montanans enjoy relatively liberal hunting seasons for more ungulate species than other western states. The financial investments and sacrifices made by the hunting public to restore ungulate populations are significant. Safeguarding those investments for present and future generations is an important priority for many of Montana's citizens and MFWP. MFWP seeks to

maintain the public's opportunity to hunt a wide variety of species under a variety of circumstances, and to do so in a sustainable, responsible manner." FWP must prepare a wolf management alternative that places this issue front and center, and which goes well beyond the near-footnote mention contained in the current draft EIS.

When crafting a wolf management plan for Montana, FWP must recognize that it is required to honor the political will of the people of Montana. The greatest confluence of interest concerning wolves in Montana is that common ground shared by hunters and stockgrowers. MSSA recognizes that the threats to tradition, culture and economy shared by hunters and stockgrowers have a significant overlap - our interests are very similar - that wolves must not be allowed to disrupt our traditions, culture and opportunities. We submit that the common ground shared by hunters and stockgrowers is the single greatest area of political interest concerning wolf reintroduction in Montana. Further, we submit that this collective interest is the dominant influence, and most nearly expresses the collective will of the people of Montana than any other. Also, MSSA wishes to remind FWP that it is hunters who pay the bills for wildlife management in Montana, and therefore, the collective voice of hunters must be given a commanding role in FWP management decisions that may have a profound effect on our traditions, culture and opportunities. Said differently, although wildlife advocates may be "interested" in the wolf issue, they are not true stakeholders in the way hunters are. No matter how wolf reintroduction is spun or explained, there is no escaping the reality that advocates of wolf reintroduction and subsequent wolf management have always envisioned feeding their pet project on the savings account of hunting opportunity that hunters have fostered with a century of effort and financing. That savings account is the current populations of huntable game. We insist that this raid on the savings account hunters have so long and carefully fostered be kept to the absolute minimum.

The historic mechanism by which the will of the people of Montana is properly expressed is through the acts of the Legislature. It is beyond choice and discussion that in crafting a wolf management plan for Montana, FWP must give full credence to the will of the people of Montana as expressed by the acts of the Legislature, regardless of anything else. In consideration of the foregoing, MSSA rejects all proposed alternatives for wolf management contained in the draft EIS, and recommends adoption of a new alternative that would most closely resemble "Alternative 4. Minimum Wolf" in the EIS. In addition to the management directives contained in Alternative 4, the new alternative would spell out the extent to which this alternative is required by controlling acts of the Legislature, as follows: HB 262 has been passed by the Legislature and signed by the Governor, and carries an immediate effective date. It is now controlling law in Montana. HB 262 requires that FWP manage large predators (wolves, lions and bears) to maintain hunting opportunities, protect livestock and pets, and for the safety of people. The mandate of HB 262 must be discussed in the new alternative as circumscribing, narrowing and limiting the focus of FWP in managing wolves. It must drive the wolf management plan. HJ 32 contains legislatively-approved terms of delisting and wolf management, especially including the definition of "breeding pair" of wolves for management purposes (one adult breeding male of any pack, one adult breeding female of any pack, and their pups less than six months old). This definition, the expressed will of the people of Montana via the Legislature, must be given special cognizance in the new alternative. More specifically, this definition must be stated as one of the limits of the new alternative. HB 306 will allow the people of Montana to vote on putting the right to harvest wild game and fish into the Montana Constitution. Although this right (encompassing the right to hunt) is not yet in the Constitution, it is highly likely that it will become part of the Constitution early in the implementation of any FWP wolf management plan. The new alternative should recognize this likely event on the horizon, and incorporate into the new alternative the intent to be in full compliance with this constitutional provision when it becomes effective. SB 209. Since one clear goal of the new alternative will be to protect and preserve traditional hunting opportunities, FWP will have an unarguable need for the best possible information about wildlife population numbers and trends. The performance audit of FWP game counting methodologies requested by MSSA and performed by the Legislative Auditor disclosed that FWP needs significant attention to improving its game inventory practices. SB 209 requires, essentially, that FWP disclose progress in compliance with audit recommendations. It is essential that the new alternative recognize the critical importance of accurate inventories of both huntable game and large predators consuming huntable game, so FWP may correctly regulate wolf populations in order to comply with the mandate to preserve hunting opportunities. In order for any Montana wolf management plan to be authoritative, it must be in compliance with superior law. That means that the alternative eventually adopted by FWP must be consistent with these acts of the Legislature. The new alternative prepared by FWP will necessarily be circumscribed by these acts, and not driven by public opinion polls, and not even by any perceived consensus of public comment concerning the draft EIS. MSSA will be very interested to see the new alternative that is drafted in compliance with the principles and legislative mandates iterated above.

L0083: Alternative 4 is my choice. I don't like the return of the wolves and what they have done. They have over killed the elk/claves in Yellowstone. They kill the deer/young deer and decimate them wherever they are. I feel that 100% federal funding since they are the ones that brought them to Montana but Montana should have all the say in how they are managed. We live here-- we should have a say. If Montana cannot have a say, then no federal funding. Can't you people pressure the feds to straighten out the mess the wolves are doing in Yellowstone National Park??? I would like to say this -- you have put wolves in an area that we have camped in for 25 years. My son who is now 25 years old grew up there and as he grew older we allowed him to go down the river fishing, looking for frogs, etc. As the situation is today, he couldn't go down the river or up the river without a gun for protection because of the wolves. After you let the wolves go there, you saw no deer there. We need to protect their areas that are such a joy to live in and view god's beautiful land that refreshes our souls which is why we went there for that many years. You shouldn't mess this land up with wolves.

L0089: Montana needs to manage its "alien" wolves now. These wolves should have never been "introduced" in the first place. I have personally observed on several occasions packs of 4-6 chasing deer east of Cooke City 25 miles on 50 or Chief Josephs Highway. Ranchers will take matters in their own hands and will now shoot wolves on sight. Fine with me. Would prefer an "open season" with bounty, but a wolf season will do. Time is now to start "cutting" the packs down to size by hunting, baiting and trapping. The future of other game is at stake, not to mention pets and cattle.

L0133: After a more detailed study of the wolf management plan, I am saddened by the proposed alternative. I honestly believe the document to be flawed, with the preferred alternative counter to Montana's game management objectives. Predation on big game populations is the greatest concern I have on the liberal approach to wolf management. There are only three paragraphs (Prey Populations) discussing the impacts on big game populations from Alternative 2. This discussion does nothing to attempt to quantify the expected impacts caused by the expanding wolf population. The Plan's writers sum in up by the following sentence which gives me no comfort "FWP would integrate management of predators and prey in an ecological proactive fashion to prevent fluctuations in both predator and prey populations" Now, really that's just a bunch of BS! How in the world can that statement lead to anything constructive? I want to know the best estimates as to the impact wolf numbers will have on each of the big game species. I want honest estimates so I can better understand what the future of hunting in Montana will be for me, my kids and grandkids. The plan suggests future action may be necessary to reduce pack sizes. Whoa! If the effort is to accept the expanding number of wolf packs and only remove individuals then it need to be re-evaluated! There must be a provision to remove entire packs and not just some of its members. Any reasonable person understands that removing one or more individuals from a pack will do little, if anything, to reduce the impacts caused by the pack. The cost for the monitoring/management effort scares me. Eight hundred thousand dollars per year for the wolf is high and is way understated. There will always be

another study because of some smart idea from the staff that just has to be conducted. Then there will be more staff needed. All of this money will eventually be the responsibility of the State to finance, probably through license fee increases. Once the State takes over, it is my bet that the federal government backs out of the funding but keeps pressure on the State to perform. The cost estimate is very conservative. What is the number of packs Montana needs? If we need a minimum of 10, then manage for 10!!! If we ever get short, and I seriously doubt we will, then we can add them very quickly as we all understand. Given the understanding of wolf population dynamics, wolves will take care of themselves: what we need is someone to look out for other species of wildlife. What is proposed in Alternative Two will cost vast sums of taxpayer's money to monitor/manage an animal that only needs heavy pressure to keep their numbers in check. The preferred alternative is costly, liberal in favor of the wolf, requires excessive government intervention and will have high negative impact on game resources in the State. My hope is that FWP will revisit the plan and write it in favor of protection of the wonderful game sources we currently have in Montana.

L0145: Some livestock loss to wolves is not reported. It does not do any too report to crooked US damage control people. I predict all hunting will stop in about thirty years unless the wolves are killed.

L0153: 1)It appears alternative #2 is the best of the ones presented. I would rather see the state manage the wolf population. The federal government only introduced them but does not properly manage them. 2)Funding is a concern. Given the current situation in this state where is the money going to come from? The federal government has to help with this. Prey management is a concern if necessary wolf numbers must be reduced, not hunting opportunities.

L0155: The need for the preservation and strong population of elk and game, which are being reduced by wolf kills, far outweigh the need for a strong population of wolf. Urge you to support and create a plan to de-list the wolf and preserve the other game animals that are more important to all.

L0166: A substantial decrease in elk and deer numbers caused by wolves can only lead to a decrease in hunters, which in turn will result in higher prices being required for tags, which in turn will lead to even lower numbers of hunters.....Has anyone given any thought as to what impact will have on communities and towns that depend on hunter revenue? The statement that "new" license revenue may be generated by implementing a regulated harvest program as a management tool "terrifies" me. What this indicates to me is that the FWP is already counting on revenue from selling wolf tags, and when this happens the goal of maintaining a minimum number of packs becomes secondary to that of maintaining a population viable enough to sustain a budget requirement for continued revenue. This is almost like a justification for higher wolf numbers at the expense of lower deer and elk numbers. I would favor alternative #4, simply because see no cap on the number of breeding pairs in alternative #2. Table 43 (pg 148) indicates a potential high of 54 breeding pairs in 2015. There is no way I can support this plan and it seems a bit underhanded to give lip service to 15 breeding pairs when in fact there is no cap. Should be entirely funded by the federal government. The state should not implement a plan which relies on revenue from the harvesting of wolves. In my mind this is a direct conflict with the management of deer and elk, for deer and elk numbers are going to be reduced in order to support a viable wolf population large enough to sustain a wolf hunting program. I find it hard to believe that an aggressive, federally funded program to limit the number of wolves to 13 breeding pair would be more costly than a program that would manage up to 54 breeding pair in 2015. Lets get real people. Plan should be contingent upon adequate funding by the feds, as they have knock for changing the rules whenever it benefits them. Don't see how a good plan can be developed without setting down with the other two states involved. Makes no sense for states to perhaps come up with diametrically opposing plans. I am sure Idaho and Wyoming wouldn't want to manage for the deficiencies or excesses of Montana's plan, and likewise Montana shouldn't have to do it for those two states. Plans that are compatible would benefit everyone.

L0191: I remain concerned that alternative 2 is unnecessarily liberal and encourage reconsideration of alt. 4. With a three state recovery area Montana's contribution to the recovery effort need no exceed 10 breeding pairs or 1/3 of the area goal. Adverse economic impacts would be minimized with lower sustained wolf population. Opposition from cattle producers would be minimized along with potential contention that may result between ranchers and sportsmen (landowner's proposal to withdraw from block management in "protest"). Somewhat deficient in its assessment of potentially adverse impacts to elk populations. 200 wolves consuming 7(?) elk apiece represents an economic impact that is not quantified in the EIS. Using a value of poaching violations, \$1000 per elk, predation poses a potential economic loss of \$1.4 million annually, lost hunter opportunities and revenues. Given Montana's rich and economically important hunting heritage, any serious threat such as a significant increase in predators deserves exacting quantification.

L0194: Wolf numbers should be kept lower than 15 breeding pairs until further study can be done to ascertain the impacts wolves are having on declining elk populations and depredation on livestock. Should not use state monies to manage. Craft a plan that is best for Montana hunters. I am disturbed by lower elk numbers.

L0197: 1)Alternative 4 is best. Wolf kills of elk calves and deer fawns is understated in your EIS. #4 is also more responsive to my concern over human safety and domestic livestock depredation. 2)You Under stated the extent of current wolf use of private lands (pg 137). The EIS fails to admit that wolves will significantly reduce elk and deer populations, rather you cite research which raises only questions. This failure cast doubts on the credibility of other conclusions or information presented.

L0200: 1)No mention of management on wildlife refuges which may border private agriculture land. High numbers of ungulate populations need to be lower to prevent attraction of large number of wolf packs. 2)Traveling wolves are not counted in the recovery process.

L0212: 1)#3 Maximum wolf. The ecosystem evolved with wolves and important part, weeding out the weak and the sick prey and stabilizing deer and elk populations and the result being genetically superior population of prey species. While wolves can become predators on domestic livestock, this problem should be dealt with by weeding out problem animals. 2)Stock predation on private land should be compensated for, by the government if private compensation is not available. Stock losses on public land would be considered part of the cost of doing business and some allowance for such losses should be recognized in determining grazing permit fees.

L0213: 1)#3 Maximum wolf. Wolves are definite plus for the ecosystem as a whole. Natural predators are better than hunters in improving the genetics of game populations. 20 breeding pairs (if not treated as a maximum) gives the wolves a better cushion against the predations of humans and the fluctuations of prey numbers. If there has to be a season on wolves it should be very tightly regulated, better would be specific elimination of problem wolves. 2)Stock losses on private land should definitely be compensated by the federal government if other sources are not available.

APPENDIX 5

L0244: I concur with all the points of the MSSA. Alternative 4 does not go far enough in protecting our dwindling investment, nor consider the recently portent laws.

L0246: I concur with and support the MSSA. State agencies must align themselves and their policies with Montana state law.

L0253: In accordance with our belief that uncontrolled wolf populations will reduce big game hunting opportunities and our support for hunting as a multiple use on public lands, we vigorously oppose all of the alternatives, except alternative 4. We feel that there are already too many wolves in Montana. They must be controlled before their numbers get out of hand. It appears that wolf management may become very expensive. MFMU feels that we need to reduce the numbers of wolves in Montana until they reach a level that we can afford to control. Hunting will never work as a means to control wolves. Alternative 5 is not a contingency; it is a capitulation to federal power and a waste of money. MFMU believes alternative 4 would be more palatable to some, even though a declaration of the wolf as a predator or fur bearer may actually be more useful to Montana. The primary reason for choosing alternative 2 over 4 is a belief that Montana must comply with federal dictates of USFWS because of the ESA. In order to fulfill its obligation to citizens of Montana and manage wolves for the benefit of Montana, it may be necessary for the state to vigorously defend its wildlife management right both in court and in the media. It may be an expensive and lengthy undertaking. Nerveless it must be done because the only other option is a complete surrender of the right to manage wildlife to federal bureaucrats. If wolf populations are not aggressively controlled, big game populations will continue to crash and the purchase of hunting license will follow that trend. Before long MTFWP will depend almost entirely on Montana taxpayers for their funding. If wolf populations are not controlled in Montana, and soon, MTFWP will become irrelevant and unnecessary. MFMU completely supports the comments of Montana Shooting Sports Assn. regarding Montana wolf management.

L0256: 1)Alternative 4. 100% federal funding. I do not want my hunting license fee's to be used for managing wolves, which compete with me in the taking of wildlife. Wolves also threaten agriculture, which supports much of our big game. 2)Restrict wolves to Yellowstone and Teton Parks and Glacier Park. Any time they are outside the parks the wolf should be considered a predator, like the coyote. If FWP is going to continue to have good hunting FWP needs to control the number of predators.

L0264: We feel the reintroduction of the wolf severely threatens present and future hunting opportunities and would like to see wolves aggressively managed in order to minimize that threat. Concerned about the negative economic impacts which may occur throughout the state should hunting opportunities be diminished by wolf predation. We should support an alternative which will place management firmly in the hands of Montana FWP. We feel 15 breeding pairs is too many. Our membership is not interested in hunting wolves. Their primary concern is that ungulate populations remain as stable as possible. We support alternative #4 and support the provision that wolf distribution be restricted to areas where the least impact to livestock would occur.

L0277: 1) Alternative #3. This allows for more breeding pairs yet strong landowner flexibility in dealing with problem wolves. 2) State of Montana participates to some degree in the compensation program. I am an avid hunter and outdoors person and strongly support the wolves' place in Montana.

L0279: 1) Alternative #2 - Gives State of Montana the most flexibility to deal with wolves. Prey management balanced with predator management. 2) Maintain wolf numbers at present levels. We don't need any more wolves - When will elk and deer numbers reach their all-time lows? What will courses of action be when they do? Will hunters suffer first?

L0289: I have been in and up every drainage from Hungry Horse Dam down to the White River. My best areas where game was always around have little to no deer and elk anymore. Elk were completely gone and every deer track we saw had wolf or lion tracks following them. I fly an airplane and have been unable to find herds of elk the last three years where they usually are. The Spotted Bear area is saturated with wolves. I agree with the MSSA position on the wolf EIS.

L0308: It is most difficult finding an alternative that is correct for all Montana residents and businesses. We believe alt #2 comes close as any with the exception of a couple of amendments. Central Montana's #1 resource is agriculture and with hunting a very important second. We as constituents of central Montana are very adamant that we do not want wolves established in central Montana. We feel that it would be detrimental to central Montana's economy to let wolves establish here. This action would devastate our already depressed agriculture and hunting based economy. We as landowners would be forced to remove most of the land from the state block management program and privately owned average from public use to protect further predator depletion of our domestic and wildlife animals that presently utilize this habitat. We realize that it is critical that we get the wolf de-listed and feel you can do this under alternative #2 with these exceptions: You establish a zone for wolf population. Give landowners more flexibility in the central and eastern zones. We have enclosed a map. Wolves should not be allowed to establish themselves east of this line. We would like to see wording in alt. 4 page 91 added to alternative #2. Wolf distribution would be artificially zoned so that wolves would be strongly discouraged in central and eastern Montana and may in fact be routinely trapped and relocated to western Montana or removed from the population if suitable release sites cannot be found. Wolf presence in region 4 and 5 should only be allowed in the areas on our map. The administration, delisting language from alternative #4 should be added to the eastern zone on our map for alternative #2. We believe that resolution #6-2003, drafted by Fergus, Petroleum and Valley county speaks for the agriculture and hunting constituents of our central Montana area.

L0320: Urge you to adopt alternative 4 to keep the wolf pack in check. I would like to see a few elk, deer, sheep left for my grandchildren.

L0335: If we only have 10 packs in the state, which is not correct, the math adds up to 2,400 head of elk killed per year by a 10 member group of 10 packs. That's a large herd of elk which will take years to recover, if ever. These numbers do not indicate any of the known deer, moose, mountain sheep or buffalo killed annually; nor the livestock highly impacted in the agriculture system. With this information I am recommending that you limit the packs to the minimum allowed to keep them delisted and no more. Limit the pack size to 10 members and list wolves in general as predators with no regulation except the existing minimal required packs.

L0344: 1) We support alternative #2 primarily because it gives the state control, provides compensation, allows for hunting, trapping and gives landowners flexibility. Also it is very important that wolf numbers and management takes into account moose, elk, deer and antelope numbers. We feel alternative #5 should be perused in the interim. 2) Changes we should like to see are: Compensation for all pets killed by wolves whether it is a horse, dog, cat, etc. But particularly for working stock dogs. Should be funded from general fund, as well as other public and private sources.

L0352: 1) None of the alternatives are acceptable, #4 would be the minimum. The least wolves the better. They are decimating our wildlife in record numbers. They weren't endangered in the 1st place. It was just a make more government jobs. Why don't you represent the hunter and fisherman who pay over 62% with their license fees? If there were too many elk in the park why not transplant them to other areas, like the Flathead and Bob Marshall? You would've been backed 100% - but no - you didn't stand up for our rights just your jobs! 2) Pay compensation to rancher, full market value for the size of animal would have sold for when grown. Make the wolf lover pay the bill. Maintain a hunting/trapping season. Keep the feds out and do your own management. But Feds should pay most of the costs - it was their program to start with and crammed down our throats. Please stand up for our wildlife and the people who are paying your salaries. Show some guts and tell them to take the wolves back east someplace if they love them so much and kill out their wildlife.

L0050: 1) Alternative #3 more wolves promote healthier big game populations. They also create a more diverse scavenger community. More wolves generate tourism dollars unlike livestock industry which is dependent on government subsidies for its survival. More wolves fill a vital ecological niche that was destroyed because of cow ranching. 2) Manage wolves like other wildlife such as elk, bear and mountain lion. Provisions for killing of wolves by citizens should be clear and specific. Funding must be assured before the plan is finalized. Key areas of wolf habitat should be protected during the opening season, large areas must be maintained for both wolves and their natural prey free from disturbance by people.

L0063: 1) #2 with some changes. 2) I would have no more than 15 breeding pair. We need to see if the elk population can handle 15 breeding pair. A study should be performed to see if the wolf is the reason why elk population is falling. The federal government should pay for the wolf program. They pushed this on us. That would make both pro wolf people and people against wolf pay for the program.

L0072: 1) I prefer alternative #2. It allows the wolf to exist and at the same time recognizes the rights of the hunting community and livestock owners. 2) Hunters must have the right to hunt the wolf as any other big game animal. Owners of livestock, pets or hunting dogs lost to wolf depredation should be compensated.

L0077: 1) Alternative 3 addresses my concerns because 20 breeding pairs seems adequate - 15 is not enough. FWP management will ensure efficiency. Prey and predator management is important, moderate approach. 2) What exactly are the flexible tools for landowners? What percent of funding will be covered by public sources? Will there be compensation for livestock conflicts to landowners? How will FWP address local concerns?

L0084: 1) Alternative 4. I don't like wolves and what they do. They have over killed elk/calves in Yellowstone. They kill the deer/young deer in areas they are in that I and my family love to camp. You don't see deer when the wolves are there. 2) 100% Fed funding. But shouldn't have to comply with federal laws only - We live here, we have the say not the feds. Can't you pressure the feds to straighten out the Yellowstone mess?

L0096: 1) Alternative 4, lowest number of wolves, federal government pays, Montana citizens wouldn't be taxed for the expenses, Montana sportsmen would not be assessed in license fees, game populations would remain the largest, would FWP manage wolves as well as they have managed flathead lake salmon. 2) Put wolves evenly throughout the state as there is as many deer in eastern Montana as western, require all 50 states to have at least 10 breeding pair, who made the decision that only 10 breeding pair are necessary?

L0103: 1) Alternative #2. I do not necessarily agree with all the specifics, but I do think this plan is the one most likely to get approval from the federal government, and the sooner wolf management is under state control the better. 2) I think the number of breeding pairs is too high. I also feel that the effect on elk populations specifically should be taken very seriously. Many Montana citizens make their living as outfitters and/or guides. These people take pride in and care of their elk populations, and that should not be destroyed.

L0130 1) Alternative 2. 90% of the funding coming from federal, the rest from the state or private org. Wolves need to be managed and this seems to be the best. 2) I am concerned about deer and elk populations in certain areas. Its going down drastically, will anything be done or will it be allowed to be wiped out and the wolves move on. I'm concerned FWP will not move fast enough to do anything significant.

E42: 1. The Manhattan Wildlife Association a non profit organization of over 1000 members mostly made up of Montana Hunters and Shooters would like to endorse the Montana Shooting Sports Associations position concerning the Wolf EIS. 2. As described in the letter from the Montana Shooting Sports Association Thank You.

E49: 1. The preferred or updated version thereof. 2. I don't think adequate attention has been paid to the give and take of micromanagement of game species vs wolf. I think it imperative that we incorporate mechanisms to reflect holistic game management. For instance if elk plan management objectives can not be achieved in an area and wolves are documented to be the primary cause the adjustments should not be to the elk side of the equation forever. There needs to be a specific mechanism left in place to be able to adjust both sides of the equation....wolves or elk. Specifically we have worked for years to build an acceptable age structure in the bulls segment of the Sun River herd...a work in progress. If in fact wolves have a seriously negative affect on that effort I think we need to be able to tweak our wolf management to accommodate those desires. We don't want to simply give up opportunities for elk in trade for non-opportunities for wolves. In an area like Sun River with wilderness herds that are historically low production with an already full compliment of predators we can not be painted into a corner where wolves are the dominant management species. And at some point we must have permits on surplus wolves!

E78: 1. I support the implementation of Alternative 2 – Updated council (Preferred Alternative). This is a thorough and solid plan that I believe will ensure the persistence of wolves in Montana while adequately addressing the potential environmental and social impacts of a recovered wolf population. 2. Please consider the following comments in regards to the draft wolf environmental impact statement: 1. In the section titled Prey Populations it is stated: “If reliable data indicate that a local prey population is significantly impacted by wolf predation in conjunction with other environmental factors FWP would consider reducing wolf pack size.” Given that prey populations naturally fluctuate in response to a variety of different environmental and biological conditions I believe that it is important that you clarify what is meant by “reliable data.” Of course it is reasonable to believe (and has been shown) that prey populations have declined due to predation and in some cases wolf predation may serve as an additive factor. But predators are often the first to take the blame for perceived declines in prey populations and significant pressure is often put on managers to control predators in these instances. Indeed predators are easier to control than the weather or disease. But ecosystems are complex and it is often difficult to tease out the effects of predation on prey populations even after multi-year studies. I foresee wolves often taking the blame for declines in prey populations and therefore highly recommend that FWP clarify what kind of data are going to be used to sort out this issue. 2. In the section titled Livestock/Compensation I have

2 issues to address regarding 1) identification of individual problem wolves and 2) use of selective removal methods. In the 4th paragraph it states: "Management actions will be directed at individual problem wolves." Although this is a logical approach it has proven difficult under USFWS management to identify individual wolves involved in livestock depredations. Attempts have been made to identify problem wolves but many control actions have resulted in non-selective removal of wolves from implicated packs. Also in paragraph 4 it states that: "Non-selective methods such as poison would not be used." No mention is made of aerial shooting of wolves as a potentially non-selective method and this needs to be addressed. Aerial shooting of wolves has been one of the primary control methods used by WS but I would argue is one of the most ineffective and non-selective tools to manage depredating wolves unless the goal is to remove the entire pack. I believe the best long-term strategy for managing depredating wolf packs is to attempt to create a control situation whereby remaining pack members may learn from the event. Packs that undergo partial removal by aerial gunning do not experience any learned behavior in associating depredation behavior with the removal event because control often takes place away from the depredation site. I believe the concept of learned behavior needs to be taken into account in how lethal control is carried out because aerial shooting of wolves is extremely expensive and a waste of state and federal money unless conditions do not permit an alternative option. Therefore due to the combined problem of properly identifying problem wolves and conducting selective removal I recommend the following approach to lethal control in situations where livestock are kept in confined pastures (most private land situations). 1.) If problem wolves can be identified then aerial shooting may be an acceptable option. 2.) If problem wolves cannot be identified then the first step should be to issue shoot-on-site permits to the affected landowner(s). If the landowner shoots a wolf or wolves on his (her) property then this situation has the potential to create a situation whereby the rest of the pack learns to recognize the area as unsafe while at the same time enabling the landowner. This method is also less expensive then using WS to conduct control. 3.) If the landowner does not want the shoot-on-site permit but still wants wolf removal or if the shoot-on-site permit does not result in the taking of a wolf but depredations continue then WS should initiate trapping operations on the ranch or attempt to shoot wolves on the ground (example: shooting wolves that return to carcasses at night). 4.) If #2 and #3 fail then initiate aerial shooting operations. When depredations occur on public lands I recommend the following approach to lethal control. 1.) If problem wolves can be identified then aerial shooting may be an acceptable option. 2.) If problem wolves cannot be identified then control should consist of trapping around the carcass or shooting wolves that return to the carcass at night. This assumes there is enough of a carcass remaining that it is likely that wolves would return. 3.) If #2 fails then initiate aerial shooting operations or issue shoot-on-site permits to livestock owners. 3. In section titled Livestock/Compensation it is stated (7th paragraph): "Considerations leading up to removal of wolves include persistent wolf activity evidence of wounded livestock the likelihood of additional losses if no action is taken evidence of unusual attractants and/or intentional feeding of wolves." The way this is worded makes it sound like "evidence of unusual attractants and/or intentional feeding of wolves" could result in the removal of wolves. I do not think (hope) this is what was intended by the statement. This should be rewritten to clarify that "evidence of unusual attractants and/or intentional feeding of wolves" may result in decisions to NOT remove wolves. 4. I am very pleased and supportive of FWP's proposing \$50 000 annually to be allocated to "efforts to reduce the risk of depredation and implement more proactive management strategies." In the Livestock/Compensation section there was mention of WS potentially helping with these proactive efforts. I believe that this is INTEGRAL to a successful proactive management program and would recommend that FWP include this as part of their annual contract with WS to ensure their involvement.

E79: 1. FWP preferred alternative. Big game hunting in Montana is an important economic asset for our state. The wolf population is a heavy determining factor on game numbers and hunter success. FWP is the best equipped agency to determine the best wolf/game balance. 2. I would like to have the fewest wolf packs possible for the benefit of the game population. After all there is a very good reason the wolf was eliminated in the past.

E82: 1. One of Montana's largest dollar based business is hunting. I am in favor of alternative No. 4. If there was a choice for going back to the way it was prior to the introduction of wolves that would be my choice. Montana needs to take control of it's own destiny and protect the hunting heritage that we have today before it is to late. There has already been a reduction in hunter opportunity in the hunting districts around the park and it wont be long before it effects other parts of the state. 2. Delist the wolves and let the state of Montana regulate them with no help from the fed's.

Funding

Summary of Comments: These comments address wolf management costs, sources of funding, and the reliability of funding in the future. Many comments indicate strong support for federal funding to cover 90-100% of management and compensation costs. Other comments support using a diversity of funding sources; a subset of these comments are concerned about "strings" or "agendas" being attached to the funds. Some comments strongly oppose FWP using any revenue generated from the sale of hunting or fishing licenses for wolf management. Some comments say that the FTE and operating expense estimates are either (1) too inflated or excessive or (2) too low to implement the program. Many comments agree with FWP and the Council that having adequate funding was a caveat to the State of Montana assuming management authority. Some comments give ideas for generating revenue to support the program (e.g. sale of wolf license plates, surcharge on entrance fee to Yellowstone and Glacier national parks, establishing a means to accept private donations etc.).

Response: FWP agrees that supplemental federal funding is needed to implement the program. In fact, Montana, in conjunction with Idaho and Wyoming, has been preparing a budget request for eventual submission to the U.S. Congress to support grizzly bear and wolf management in the tri-state area. FWP recognizes that a diversity of sources may ultimately be required to fully implement the program, which may include license and matching federal revenues on par with mountain lion and black bear management supplemented with private sources. FWP has not precluded any sources of funding, including tourism, special license plates, or surcharges to national park entrance fees. FWP is also aware of and shares the public's concerns about the long-term reliability and adequacy of federal funding for state programs. The Wolf and Grizzly Bear Trust Fund concept originated out of those concerns. That concept is still under consideration and

is being worked on as the long-term funding source. In the meantime, the three states are seeking special annual federal appropriations due to the immediate funding needs in the near-term.

FWP also agrees with the comments that it is important to have adequate funding in hand prior to implementation. FWP clearly recognizes that the public has high expectations for improved agency responsiveness, more reliable information on wolf population size and distribution, and improved agency public outreach, compared to the level of satisfaction in the current outreach efforts expressed by the public. FWP strongly believes that adequate funding and FTE's are critical to accomplishing the work and being responsive to local concerns. FWP does not believe it can meet the public's expectations nor implement a sound wolf management program successfully without additional funding and FTEs. FWP believes that adequate funding and FTE's are also important so as not to degrade or erode efforts in other important and popular program areas. FWP made reasonable, good faith estimates of what it thought would be required to implement the program in its entirety and to represent the programmatic nature and sometimes "hidden" costs of administration. While the budget in the Draft EIS did not account for overhead or inflation, the formal budget request to Congress (for the next five fiscal years) does include overhead. The requests do not incorporate inflation because these adjustments will be incorporated for each annual request in subsequent years. While FWP (with Idaho and Wyoming) will still pursue the concept of a trust fund as a long-term funding source, FWP is also working with Idaho and Wyoming officials to obtain annual appropriations for the next three to five years while continuing to work on creating a trust fund. The budget in the Final EIS was amended to reflect what FWP will be requesting from Congress for wolf management in the near-term.

FWP thanks the public for providing ideas on how it could generate revenue to support wolf conservation and management activities at the state level. FWP is willing to work with interested parties to explore these options in greater detail. FWP will be putting concerted effort into securing adequate funding for implementation of the state program after this step of the planning effort is completed and while the USFWS completes the administrative steps for delisting.

Representative Comments:

W8: It is going to be expensive.

W19: I want to see outside interests share the cost.

W30: We want federal, but not federal control.

W33: Concerned with who is paying and why.

W76: Don't need to spend a disproportionate amount managing predators.

W79: Passionate hunters are about wildlife, as long as there is a prey base to satisfy hunters; the money will be there. Hunters need to be strongly represented in the equation.

W92: State should not do plan unless reds fund program.

W93: National interest -- should be paid nationally.

W125: \$800,000 seems reasonable for annual budget.

W129: Cost will be 2x more than \$800,000.

W161: State needs a method to generate money and have money before we implement the plan so we don't start in a deficit.

W162: Money should not come from hunters. Park Service should have a surtax generated for wolves from wolf viewing.

W206: I am president of the Western Montana Fish and Game Association. Our group doesn't support license dollars being spent on wolf management. USFWS should pay for the program.

W217: Private funding should be sought --not public funding. No alternatives address this.

W295: Hunting opportunity?? If yes, then okay to spend some state \$.

W298: Contact congressmen.

W299: Endowment for wolves would include ecosystem management and private property interests.

W334: Too much money going to administration and not enough into the on the ground problem.

- W354: Since the federal government introduced wolves why should the state have to pay any money to fund management? The feds should pay up the money.
- W378: Establish a trust fund with federal money, using only the interest.
- W382: If wolves are bringing money in, then the money brought in should help pay for it.
- W383: Tax on wolf paraphernalia for supporting wolves in Montana.
- W388: Hunting will generate revenue.
- W444: Management cost \$800,000 will be small compared to compensation costs.
- W464: Lean towards #4 because it is fully implemented with fed dollars. Why should we be paying form them?
- W477: Regarding funding: State of Montana shouldn't have to pay. People who supply funding should not have increased influence on how wolves are managed.
- W478: Spread funding out to people who want wolves.
- W498: Concerned about federal funding, PILT results – under funded. Fed's have a great reputation for that.
- W513: See if we could earmark funds from the bed tax for wolf/grizzly management and/or compensation.
- W520: Irregardless of which alternative is selected, the funding structure should be based on which government entity is responsible. The amount of funding from each is based proportionally on the level of management responsibility.
- W528: If we use private funding sources it would involve private interests. Should be public funding; want people of Montana, Idaho, Wyoming to have the most say; should be state funding only.
- W553: Federal Government doesn't tend to fund ongoing projects.
- W573: If private sources involved in funding they can't dictate policy.
- W608: If you can't sell wolves, you can't sell anything don't believe public money needed; private funding would sell.
- W666: Concerns about delisting without \$\$ in place; Alternative #2 is best choice, overall allows wiggle room; good management choice.
- W682: Tie funding to non-consumptive use.
- W683: Montana needs to be responsible for some of the funding.
- W699: Do not mind if my money goes into supporting animals that are not hunted.
- W700: Recognize that sportsmen money support non-game species.
- W703: Also support #3; if we use sportmen money, there is a sufficient population for a hunt.
- W715: Funding form management – money should be in place before implementing the plan.
- W717: YNP fees – a source of money for management?
- W720: Shifting any money from existing programs in Montana is almost impossible.
- W723: Hunting guides with FWP personnel for guided wolf hunts to raise money.
- W735: Have you thought about ways to capture revenue from “watchable wildlife” type programs to fund wolf effort and create a constituency to support the program.
- W736: Could there be income tax check-off to help fund wolf management or tax certain items?
- W737: Sportsman and livestock producers oppose having to fund wolf management; other environmental groups that are so heavy into supporting wolves should have to foot more of the bill.
- W749: I would support a nongame license plate to support the wildlife.
- W751: A wolf visitor center could be used to help raise money and educate people about wolf conservation.
- W783: I don't think I should have to pay for it.

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W835: Can't support any of the until funding sources are cleared up! Funding has to be clarified.

W869: If you have federal \$\$ in management, then you have federal control over management. We want state funding or program and state control.

W883: Up the grazing fees on public lands to pay for the program.

W884: Let PETA pay for it.

W919: Everyone, photographers, watchers, etc. should pay for wolf program ... tax check off etc. Everyone who enjoys wolves would/should pay.

W924: Licenses fund program – wolf funded from hunting and trapping wolves.

W986: From what I hear, it's going to be better to have them under state control. If you don't have the funding, are we better off where we are now?

W988: I think it's important that /senators Baucus and Burns be consulted to see how then can help us get this funded.

W1049: Better spend money management wolves than on compensation.

W1066: Should have no state \$\$ in any plan. Montana residents should not have to pay for a federal problem. The whole nation should pay.

W1109: I think a fee of \$1 per car should be assessed for management. I would be happy to pay for it if it meant compensation without the right to kill wolves. I'm happy to give money for management but not for management that involves killing.

W1110: Funding and personnel needs have to be addressed to adequately manage a wolf harvest.

W1112: I hope that this wolf management program does not become a burden on the people of Montana. It should be federally funded.

W1172: Likes state involvement, but we have to pay.

W1234: Absolutely wrong for general license dollars to go to wolf management. Ok for wolf license money though.

W118: I like Alternative #5. Deals with where money is coming from, but don't like the numbers. Montana should take a greater share of the expense and responsibility. I am concerned about the distribution of wolves, not just a blanket number.

W1238: Concern about where the funding is going to come from. Whoever provides funding is going to want some control -- especially private sources from out of state.

W1300: Alternative #4 if appropriated money (federal) did not show up it would be a problem. Work funding in ahead of time ... more stable; Stable no matter what alternative is important.

W1302: Money is my biggest concern. Alternative #2 is fine.

W1334: Support alternative #2 even with removing what now -- there are still good wolf numbers. All should pay to stay involved. Delist and move to trophy animal.. Harvest leads to appreciation. Hunting leads to a voice in management. No sudden increases in n8mbers.

W1356: Program funding – before delisting, Montana needs funded plan or it's not viable plan. Need funding decision before management decision.

W1357: Of state wants management control – state must pay; federal money = federal program.

W6: 1. If given enough time and enough wolves they are sure to eat someone's grandchild going to the school bus or playing or whatever kids do. 2. Don't spend money that is needed elsewhere to protect or manage wolves.

W11: #2 – the problem is FUNDING. With no committed private or public funds at this time, no alternatives will be functional. Montana and other states are in dire economic stress and I see no way to get anything going. The ability of the state to manage wolves is not the problem. It boils down to "bucks".

W34: 1. Alternative #2 – most local control and accountability. 2. Funding should come from public sources only!! Public action reintroduced wolves into state. Historical problems were well documented and federal government and public assumed this risk.

W39: 1. 2 or 3. I would like wolves, so 3, but I think 2 is a good plan. Plan needs: compensation program, adaptive management for local populations. High value on wolf as a big game trophy; innovative funding; wolf startup with tourist tax, private foundations etc.

W44: 1. None. No plan has been implemented to totally control the wolf and the expense is given to the taxpayer. Wolves will kill wildlife as well as domestic livestock, which will dramatically affect agriculture and the financial stability of the state. 2. See hunting permits to fund the state costs and finance any damages to domestic livestock.

W46: 1. No's 2 or 3. 2. Feds should fund 90%.

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W83: 1. Combo of alternative #2 and #4 (more aggressive management approach). 2. Don't manage for a single species. Sliding scale on number of breeding pairs. Figure out funding mechanism prior to management plan implementation. Don't let outside interests dictate how Montana manages a wolf program.

W88: 1. Number 5 then number 2. 2. I'd like to see Montana's part of the 10%/90% cost share increase.

W96: 1. I favor alternative 3 as I value more wolves in the environment and would like them mostly left alone. The greater number of pairs would help insure survival and livestock owners need to care for the animals appropriately to avoid predator loss. 2. full funding should be assured before plan is finalized. Wolves should only be killed when they clearly pose an immediate threat to livestock. Provisions for citizens killing wolves must be clear, specific and limited.

W110: 1. No 2. 2. FWP needs to manage wolves in order to manage deer, elk, and moose. Fed government to fund compensation program. 2. Needs federal funding. After all, federal government mandated we have wolves; some private funding is ok if you can find it.

L0054: Some pointers to remember that should happen before any changes are made to the wolf population. 1) Funding of the state program must be assured before the plan is finalized. 2) Provisions for when citizens are allowed to kill wolves should be clear and specific, permitted only when wolves pose an immediate threat to livestock. 3) The minimum number of breeding pairs should be at least 20, as outlined in Alternative 3 of the draft plan, to assure long-term survival. 4) Wolves should be managed like other wildlife, such as elk, bears and mountain lions, with no artificial limits on wolf numbers or boundaries. Remember people travel long distances to see wolves -especially foreigners. The wolves have as bad reputation caused by greed of the cattle ranchers over the past century. But the wolves can have a positive impact. They will promote healthy big game populations; generate \$20 million in tourism (NPS); manage coyote and other predator numbers; and, they really only cause less than one percent of all livestock losses annually (Montana Agriculture Statistics Service). Plus the Defenders of Wildlife pay ranchers for cattle attacked and killed by wolves.

L0085: My concern is for a workable long-term wolf conservation. Please develop a plan that includes funding of the state program. Provisions for when citizens are allowed to kill wolves should be clear and specific, permitted only when wolves pose an immediate threat to livestock. The minimum number of breeding pairs should be at least 20 and wolves should be managed like other wildlife with no artificial boundaries or limits. Montana is a great area as its wolf population makes it even better. Thank you for assuring a future for wildlife.

L0121: Even though Alternative 2 does not fully come into agreement with me- it comes the closest. The other alternatives are filled with issues too controlled by the federal government this forcing one to choose this alternative. Number 2 is the least restrictive with some issues I'll comment on. I feel our MFWP can manage and address the wolf management concerns well with out federal intervention. My two biggest concerns with Alternative 2 are in the area of funding and wolf harvest. I don't know where all our funding will come from but hopefully huge money groups such as Ted Turner, Defenders of Wildlife etc. will not be allowed to influence our people in FWP or at the legislative level. Possibly the wolf tags for hunting and trapping would generate monies strictly for wolf management/harvest. Due to constant monitoring needed to appease pro-wolf groups there'd be a demand for extra funds. Why not have a "Wolf" license plate for the state of Montana so that those who so desired to support wolf management whether for hunting, trapping, sightseeing could support this with all the monies to go to the wolf management program. Similar to the park plates. It would be desirable to have wolf education programs to educate the public with documentaries showing all aspects of the wolf- birth to death. But tell the whole truth not just the fuzzies about them. There's a need to get on with our program NOW by also classifying the wolf as a furbearer OR big game animal. I could see the lack of doing this delaying our de-listing by months/years! There definitely needs to be a regulated wolf harvest on the Alternative # 2 not leaving the word possible there.

L0186: Any wolf on private property or livestock allotment can be killed by livestock owner or anyone he or she authorizes. They can be listed or game animals on public property with no special license fee or no limited season. Their only safe haven in state and national parks. As for compensation for livestock losses, actual or suspected. The general public, who allowed their reintroduction will assume full responsibility for reimbursement at full market value. Also the cost of administrating the program will be in the hands of those wildlife and environmental organizations that pushed reintroduction.

L0203: I would advise caution in depending on long term availability of federal financing support. Some mechanism be set up to assure continuous funding from FWS with protection against the effects of inflation. If federal funding does disappear, it behooves MTFWP to have the prerogative to shift the management back to the FWS - somewhat like the situation provided for under alternative 5 Too often the fact that federal funds are also derived from taxes tends to be overlooked.

L0247: Forgive me for waiting until the last day to comment...spring gardening and wrapping up a school year consume me. I attended the meeting in Whitefish a few weeks back, and was impressed by the quality of the presenters and civility of the attendees. My comment card was such a mess, I had planned to write a nice long letter. Instead here is a quick list:

- 1) I am comfortable with the concept of the state taking over wolf management, AS LONG AS funding issues have been thoroughly addressed. This still needs federal dollars, because it is a federal priority.
- 2) I like alternative #3 the best
- 3) Hunting could be considered in the future, but not trapping!
- 4) Hold landowners accountable for "best practice" ranching.
- 5) Keep management in the hands of the professionals, not the politicians.
- 6) Consider wolf habitat and prey base a "higher and better use" than human use. Wolves can't go to Safeway when they don't get their elk. Again, thank you for a job well done.

L0299: We fear that no wolf control guidelines are adopted, we could loose significant number of cattle to predation. FWP must be able to control the number of wolves. Livestock owners or private citizens whose person or property are threatened must be able to kill wolves without threat of prosecution. Animal control officers must be able to quickly kill offending wolves before they kill again. The number of breeding wolves must be kept to a minimum. Cost to manage wolves should come from the federal government and pro-wolf groups, not the state of Montana.

L0322: Updated Council version of the wolf plan seems to be the most logical approach. Wolves should be delisted now, as a healthy population exists. Hunting of wolves should be allowed, with changing annual quotas dependent on current populations of wolves, deer, elk, and moose. Manage wolves as mountain lions are managed. Fees collected by the state of Montana for wolf permits/licenses could be used to help pay the cost of annual data collection on wolf, deer, elk, moose populations. Other costs related to wolf management should be paid by U.S. Fish and Wildlife Service, as it was a

federal program, not one requested by the voters of Montana. Livestock owners should be able to protect their livestock before there are losses and should be compensated for losses. There should be authorities (federal and state wildlife people) available in every county that has wolves, so they can respond immediately when there is conflict with wolves.

L0058: 1) Alternative 2 gives FWP the more flexible manageable tools to manage wolves in the future. 2) Sports and landowner and property owners would have a say in the development of compensation. Federal agencies to pay their share in the future.

L0080: 1) Alternative 1 because the breeding pair benchmark set in the other alternatives is arbitrary and capricious. Given the size of MT and amount of potential habitat, 15 packs is too few. There is no scientific justification for this number. 2) Develop compensation program. Assure funding.

L0082: 1) Alternative 3. This program seems to allow a greater opportunity to control wolves with more hunting opportunities as well as ensuring wolf recovery. Also it seems to have a greater recovery option in case of over harvest etc. 2) Allow the sale of permits to help defray cost of the program.

L0098: 1) Best is #5 because I'm concerned Montanans will be negatively affected by increasing wolf numbers and distribution due to lack of management if wolf not de-listed quickly. Would also support #4 and #2 in that order. 2) My biggest concern is that rural Montanans, the majority of which oppose wolf populations on their private and leased lands, are being required to pay the entire price, in money and in cost to lifestyle, while the majority of pro-wolf are out of state and country, people who pay nothing. Please work on a system to get pro-wolf people to bear the cost.

L0102: 1) Alternative #2 because it allows farmers to deal with them if needed and the cost is okay. 2) Alternative 5 federal government covers 90% and state of Montana covers 10% and put that on alternative 2.

L0111: 1) Alternative 2 - The 15 breeding pair benchmark is sufficient - 10 is too little, 20 is too many. I also appreciate the ability of the landowner to respond to conflicts. It is essential for the wolf to be delisted as soon as possible. 2) I feel once the wolves are delisted which provides for landowners to protect and defend private land there should not be a compensation program. Any type of a board or committee that would oversee losses and determine the "worth" of that loss creates a no-win situation. It will be difficult enough for FWP to financially manage the wolves without the added burden of raising money for compensation of losses.

L0120: 1) #4. I think federal compensation should be available for livestock. 2) Ten breeding pairs is more than enough wolves. Federal government should bear all cost of wolf management program.

E54: 1. I can live with Alternative #2 the choice of FWP. However it will be criminal if one cent of FWP revenue obtained from hunters is used to manage wolves. The people of the whole US are the ones who decided to import wolves at a high cost to those same taxpayers. Now wolves are here and thriving. These same people should foot the bill. Wolves are already reducing hunting opportunity particularly for elk. Do not expect elk hunters to pay the bill. 2. The alternative should clearly state that the federal government would pay for all costs related to wolf management. If the federal government won't accept that condition then let them deal with the wolves. FWP should bow out at that point. The federal government created the problem let them deal with it. Spend our Montana money protecting livestock and the big game herds the wolves prey on.

E91: 1. I support Alternative 4. I believe this alternative more accurately recognizes the economic impact wolves have had on agriculture hunting and other land based businesses that have formed Montana since its statehood. While expensive I believe a program similar to the National Park Service's fee-demo program would fully fund both management and compensation to livestock producers. If all visitors to Montana's national parks/landmarks/national wildlife refuges (including Yellowstone National Park which is in all 3 recovery states) were assessed a wolf management fee of \$2-\$5 Montana would not have to pay for management. Remember it is the public that wanted wolves in the first place. It is my belief that this public were largely visitors to Yellowstone National Park and Glacier National Park. Make them pay for recovery. 2. In developing alternatives I believe Montana spent a lot of time developing alternative 2 but relatively little time in developing alternative 4. I would like to see alternative 4 integrated with many of alternative 2's characteristics including flexible management hunting and restitution. I think the final EIS should recognize that there are many packs not yet located or found. For this reason while alternative 4 sets a 10 pack minimum there are probably at least 5 more packs undiscovered. I believe every effort should be made to ensure that there is not an excluded zone surrounding Yellowstone National Park where kill permits cannot be issued or wolves cannot be harvested by licensed hunters/trappers. I don't think we should continue to count packs by pack numbers. We need to devise a more realistic method of counting wolves. Many packs when in wildlife rich areas generate 2 or 3 litters a year. Thus a pack can sometimes have 25-40 wolves. This could be the size of 5 or more smaller packs. Also by current pack standards a pack consists of an Alpha Male Female and two pups of the year. Often when alphas are killed another beta animal steps in as Alpha. Thus by counting wolves rather than packs we more reasonably ensure the number of wolves.

Livestock

Summary of Comments: These comments relate to Montana's livestock industry and wolf-livestock conflicts. Some comments note a desire to be able to protect livestock and defend private property if a wolf is threatening livestock. In addition, many comments support the availability of kill permits to individual landowners experiencing conflicts with wolves. On the other hand, some comments raise a concern that the phrase "threatening to kill" could be vague, too lenient or liberally interpreted – resulting in limited checks on human-caused wolf mortality. Similarly, some comments want all non-lethal methods of deterring wolves exhausted prior to any lethal control. One comment points out that FWP did not develop and analyze the impacts of an alternative that only incorporates non-lethal management tools. Some comments suggest that lethal wolf control should come as a last resort in resolving wolf-livestock conflicts and only when human life is in imminent danger. Some comments support the ability of livestock owners or their agents to defend livestock on public land grazing allotments similar to private land. In contrast, other comments opposed any lethal wolf control on public lands and suggest that lower grazing fees already take an increased risk of predation and this is a fair

exchange for livestock grazing on public lands. A few comments point out the difficulties of successfully identifying individual problem wolves and question whether or not specific conflict management tools could really “select” the problem wolf. Some comments questioned the definition of “livestock.”

Some comments say that a disproportionate amount of time and or effort is being directed at addressing wolf-livestock conflicts when wolves are only responsible for 1% or less of all livestock losses. Comments generally support and welcome increased effort to minimize the risk of depredation to the extent possible and collaborating with landowners on preventative measures. Some comments want “best management practices” established prior to a livestock producer gaining eligibility for compensation in the event of a loss. A few comments say that the Draft EIS is deficient in analyzing the impacts of ranching or livestock grazing on public lands.

Response: FWP acknowledges that gray wolves have harassed, stressed, and/or killed domestic livestock. FWP also expects that will occur in the future. The preferred alternative describes a management program that is intended to minimize risk, to work collaboratively with all interested parties to prevent depredations to the extent possible, and to resolve conflicts swiftly and efficiently. A companion program element addresses some of the economic losses through a compensation program. Indeed, one of the main objectives of the Wolf Advisory Council was to address the concerns expressed by the agricultural community. Those concerns are addressed through the adaptive management framework described in the preferred alternative.

Despite overall industry loss figures, FWP recognizes that wolves could disproportionately affect some livestock producers because of proximity to wolf activity, livestock type, or the behavior of a particular pack. FWP is also aware that a “refuge” may exist for some packs because part of the pack’s territory overlaps national parks or national wildlife refuges where lethal control work would be highly unlikely. Tolerant private landowners could also create refuges. FWP is committed to working with individuals, industry groups, and federal authorities to lessen these effects.

FWP acknowledges the difficulty experienced by USFWS and USDA Wildlife Services in successfully identifying individual problem wolves involved in livestock depredations. Wolves are highly mobile and may be miles away by the time a depredation event becomes known. Wolves may or may not return to a carcass. FWP also acknowledges that certain control methods may not successfully target individual problem wolves. Resolution of wolf-livestock conflicts is a complex challenge due to the wide variety of husbandry methods and circumstances in which livestock are raised (e.g. large public land grazing allotments in mountainous terrain, small private pasture near human dwellings, large private ranches with remote pastures away from human activity etc.). It is further complicated by the behavior patterns and high mobility of wolves. Each situation will need to be evaluated for its unique characteristics prior to selecting a course of action.

An important aspect of an adaptive management program is monitoring and evaluating the outcomes of management decisions. Evaluating outcomes of management and control responses to wolf-livestock conflicts will be critical to identifying and correcting shortcomings or erroneous assumptions. FWP will need to improve its understanding of the various proactive strategies, wolf deterrents, and control tools prior to taking over responsibility for wolf management. The expertise of the USFWS and USDA WS will be important. FWP will also rely on the experience of livestock producers, other interested parties, and the published literature to improve its knowledge.

FWP is aware that the phrase “threatening to kill” is vague. The Wolf Advisory Council discussed this issue on many occasions and had difficulty defining what constituted “threatening” wolf behavior towards livestock with any degree of consistency from one scenario to another. FWP agrees. In Montana statute, “threatening to kill” is the same standard that applies to black bears and mountain lions in the context of defending livestock or property. Citizens do not appear to have interpreted that standard too liberally for black bears or mountain lions. Black bear populations appear to have at least maintained themselves and mountain lion populations have increased in both number and distribution with suitable prey availability. Whether or not wolf populations would be adversely affected under this standard remains to be seen. However, given the higher reproductive potential and dispersal capability of wolves, FWP is confident that corrective measures taken by FWP and the FWP Commission could mitigate or reverse any adverse effects if too many wolves are killed under the “threatening to kill” clause. FWP always has the ability to make more conservative decisions through the adaptive management framework in other aspects of the program if the wolf population approaches the relisting threshold.

In the experimental, non-essential population areas where livestock producers have had the latitude to kill wolves caught attacking livestock, relatively few wolves have been taken. Even with a “shoot on site” permit, livestock producers and

their agents report that killing a wolf on the permit would be an opportunistic event. Nonetheless, FWP is aware that human-caused mortality is the leading cause of death among wolves in the northern Rockies. The key to maintaining a viable, recovered population is adequate regulation of human-caused mortality. FWP will consider the need to provide more specific guidance on interpretation of that clause, but will provide additional information to the public on wolf behavior. A formal definition may be adopted during subsequent rule making through the FWP Commission that could be based on wolf behavior or legal standards of evidence for “threatening” conduct such as documentation of previous depredation complaints or injured livestock.

FWP will make a concerted effort for public outreach in working with landowners and livestock industry groups about what management tools and options exist in the state’s wolf management program, especially in areas outside current wolf distribution. The reader is referred to pages 76-82 of the Draft EIS for specific information. In particular, the passages describing provisions of SB163 (MCA, 87-3-130) which will guide actions by private citizens are discussed in detail. There is also a discussion of how the management approach for wolf-livestock interactions fits together with the compensation element.

FWP did not develop and analyze the impacts of an alternative that incorporated only nonlethal management tools. MEPA requires FWP to describe and analyze reasonable alternatives to the proposed action, including the “no action” alternative. “Reasonable” alternatives are those that are practical and/or feasible from a technical and economic standpoint, using common sense. In this case, the most conservative alternative (No Action) is the continuation of the existing federal program, in which lethal control is one management tool along with non-lethal tools. The federal ESA is the most conservative legal framework in which to conserve and manage species. Federal officials have found, even in that most restrictive of legal frameworks, that lethal control is warranted in some circumstances and permitted under the federal rules so long as it enhances species recovery. FWP included the combination of lethal and non-lethal management tools in all the alternatives because USFWS management experience has demonstrated that having both sets of tools available is important to addressing and resolving conflicts, which in turn enhances species recovery and maintenance. The adaptive management framework of the preferred alternative provides the decision maker the flexibility to use lethal or non-lethal management tools but directs him or her to take an incremental approach to address wolf-livestock conflicts. The incremental approach is guided by wolf numbers, depredation history of the pack, and location of the incident, as well as whether the presence of unusual attractants or intentional feeding of wolves may have preceded or otherwise contributed to an increasing potential for conflict ultimately warranting lethal control.

This EIS analyzes the impacts of a FWP wolf conservation and management plan. Administration, oversight, and regulation of livestock grazing on federal public lands are beyond the scope of this EIS process and the jurisdiction of FWP. FWP is not the appropriate agency to conduct an impacts analysis of ranching or livestock grazing. FWP can offer expertise to any analyses conducted by the agencies with the appropriate jurisdiction.

For the purposes of wolf management, the preferred alternative proposes to define “livestock” to mean cattle, sheep, horses, mules, pigs, goats, emu, ostrich, poultry, and herding or guarding animals (llama, donkey, and certain special use breeds of dogs commonly used for guarding, protecting, or herding livestock. This list is already consistent with Montana statutes (MCA 36.25.145, 32.5.101, and 15-1-101). FWP may adopt this definition through formal rule making at the FWP Commission level.

Representative Comments:

W112: Want to know specifically what landowners can do to respond to conflicts.

W176: I like the idea of rewarding livestock growers to prevent problems.

W178: I am concerned about the ability of people to lethally control wolves that are threatening livestock or pets.

W189: I don’t think they should be able to use lethal control for threatening livestock.

W200: Benchmark seems more like a limit. I question if hunting wolves is necessary in general. I think wolf numbers will be controlled enough through depredation actions.

W227: A lot of environmental groups would like to get domestic livestock off public ground and wolves are just a tool to achieve that.

W238: 90% of problem with wolves would be eliminated if farmer could be able to shoot them.

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- W242: How long will it take to get someone to come down if wolves are killing livestock?
- W272: Cows are easier to catch than deer.
- W330: The plan is flawed because in the real world, game limits number, but here livestock provide unlimited food source.
- W367: Like to see protection or compensation when livestock are on allotments.
- W400: kill permits for landowners good in alternative #2.
- W412: Alternative #4 – why should landowner have to worry about controlling wolves? They're in the cattle business.
- W454: When wolves get into stock, they are stirred up and hard to work. There are more costs than just killing stock. Sometimes have to replace some animals.
- W537: I like Alternative #2. I like the idea that Montana will be running the show rather than the feds dictating. I like giving stock owners the tools to handle problems.
- W557: Once removed from federal list, don't think farmers and rangers should be able to shoot.
- W602: Landowners lose more livestock to coyotes than wolves.
- W732: Would like to see more non-lethal research similar to burros/llamas to prevent wolf livestock conflicts. I don't want to see any more restrictions or closures. Should not go too far.
- W779: Alt. 4. probably the best. If breeding pairs go below 10, they should not be put back on the endangered list. Leave tools the private landowner has now intact (snare, traps, m44s, shoot).
- W799: Standard predator proofing don't work against wolves.
- W811: Concern about the difficulties associated with killing a wolf if they go on private land. What do I do about these circumstances? Do I have to have a confirmed kill (if I have a permit). Makes me nervous. Alternative #2 is good, but it needs to be clarified.
- W819: Something I like is a kill permit for producer. I would like to see that on first offense. Similar to bears and lions—little time to wait. Specific instances where kill permit would have saved time and money.
- W826: I like Alternative #3 the best with the addition that the state would develop a compensation plan. But I think #2 is most reasonable because it balances the need of having wolves in Montana and the landowner and livestock owner's needs.
- W833: Any management of wolves should not affect control of other predators and m44s should not be restricted.
- W974: How will the issue of a wolf kill be addressed and will it be addressed in a timely manner?
- W1130: Calves/cows losing poundage; depredation isn't the only issue; life span of cows from stress – and it takes time out of your day. Open cows at 5 or 6 years
- W1168: Use non-lethal means of wolf control – donkeys in sheep herd.
- W83: When game populations are wiped out, they will turn to domestic livestock.
- W1276: Landowner has ability to deal with livestock depredation.
- W1292: Give landowner the option to protect livestock and they will give up compensation; threat related.
- W1333: Ranchers should be allowed to shoot when attacking livestock.
- W1341: Don't want rancher to have to wait for wolf to have lame in its mouth before shooting. Alternative #2 is good for rancher involvement.
- W1360: Livestock conflicts – all alternatives need to better define when things happen when you can harass, shoot. Etc... How close is close? How threatening is a threat? Use examples to help define.
- W1394: Within the EIS – need to specify that livestock includes horses. Need to be able to handle problems/dangers to horses like other livestock.
- W1439: Need prevention programs to assist ranchers.
- W1463: Proactive measures to reduce livestock losses.
- W16: 1. Wolves should be removed from the Federal lists but I don't believe farmers should just have a free range shot on them for interfering with their livestock, because it wouldn't only be farmers. It would be random punks shooting them because they know they could get away with it. Especially since wolves are wild animals which also need to eat much like humans. Yes they highly affect livestock but their wild and it's their instinct.

You can't actually help them from attacking livestock. Can't train them not to touch livestock. Wolves shouldn't be hunted! If they allow them to, sooner or later they'll be endangered.

W19: 1. Number 3 provides for a stable recovery and management system. A regulated hunt can be used if appropriate. FWP monitoring experience is more limited. Habitat connectivity is restricted; 2. 20 pairs should be a floor not a ceiling. State plan funding should be in place before implantation. Need clear standards on when wolves can be shot for preying on livestock. You should not permit it when they are just in the vicinity of livestock.

W23: 2. More education to the general public on researching alternative ways of raising livestock in order to decrease the losses. I want to see more science -- are the benchmark ###s ecologically viable?

W24: 1. Alt 2. Best mixture of addressing concerns related to wolf management in Montana. Best attempt at resolving wildlife and livestock depredation by wolves while ensuring a viable wolf population on a sustained basis. 2. Nothing. In fact, if any significant modifications are made I might not support Alt 2.

W36: 1. Alternative #2 because it fits the general population of MT better than the other alternatives; 2. I think the compensation part needs to be really defined. It needs to be more friendly to the livestock producer.

W58: 1)Alternative #3 - It provides for more packs in case of extinction of some packs. Gov't officials have had to kill entire packs in the past. If a couple of packs have to be killed off due to livestock predation, we will still have enough packs left for a viable population. 2)Should include a government and private compensation program.

W77: 1) Alternative #2. This does not spend disproportionate amount of money on wolves, other species are of concern and need to be managed. It monitors a viable population and allows livestock protection. 2)If livestock owners are allowed to kill and haze to protect their animals why should they still get compensations? Why 15 pairs? Couldn't a reproductive value be more accurate?

W90: 1) Alternative 2 because it will be treated as a species in need of management. I like that they will be monitored. But also that the landowners have flexible tools to respond to conflict and decrease risks. 2) Thanks for involving the public!

W95: 1) I value and respect all wildlife. Alternative #3 minimum breeding pairs more than or equal to 20. Assures long term survival. Make people responsible. I live in the Nine-mile. Please stop slaughtering wolves and grizzlies. 2) Funding of state program must be assured before plan is finalized. Must have clear, specific provisions when citizens allowed to kill wolves, permitted only when wolves pose immediate threat to livestock. Manage wolves like other wildlife- no artificial limits, boundaries.

E0043: I am in favor of leaving wolf management to the U.S. Fish and Wildlife Service to be protected by the Endangered Species Act. I don't think wolves should be hunted under any circumstances. They are important predators that help keep other populations of wild animals healthy. I don't think the loss of a few domestic animals justifies killing wolves. Please select the alternative in the Wolf Plan EIS that reflects these views.

L0132: I travel to Montana frequently to observe wildlife, particularly wolves, and am concerned about wolf management in Montana. Recovery goals should be based on a viable, self-sustaining wolf population; not on an artificial cap. Promote improved livestock husbandry practices to decrease the chance of conflicts with wolves. Livestock operators should keep livestock away from active den sites, remove ill and injured livestock that would be susceptible to predation, and remove carcasses to prevent scavenging and habituation by wolves. Do not allow lethal take of wolves for "threatening" livestock or pets. Non-lethal deterrents should be exhausted before allowing wolves to be killed, especially on public lands. Penalties for illegal killing of wolves should be strengthened. Establish a state wolf management advisory council for conflict resolution and public education.

L0145: Some livestock loss to wolves is not reported. It does not do any good to report to crooked US damage control people. I predict all hunting will stop in about thirty years unless the wolves are killed.

L0154: We are in favor of delisting the wolf and then letting ranchers use whatever means to protect their livestock.

L0186: Any wolf on private property or livestock allotment can be killed by livestock owner or anyone he or she authorizes. They can be listed or game animals on public property with no special license fee or no limited season. Their only safe haven in state and national parks. As for compensation for livestock losses, actual or suspected. The general public, who allowed their reintroduction will assume full responsibility for reimbursement at full market value. Also the cost of administrating the program will be in the hands of those wildlife and environmental organizations that pushed reintroduction.

L0196: I prefer number 4. The mental stress upon a rancher should be considered.

L0212: 1)#3 Maximum wolf. The ecosystem evolved with wolves and important part, weeding out the weak and the sick prey and stabilizing deer and elk populations and the result being genetically superior population of prey species. While wolves can become predators on domestic livestock, this problem should be dealt with by weeding out problem animals. 2)Stock predation on private land should be compensated for, by the government if private compensation is not available. Stock losses on public land would be considered part of the cost of doing business and some allowance for such losses should be recognized in determining grazing permit fees.

L0220: I realize a middle of the road approach is best. Grazing on public land and livestock lost, just the risk a rancher must take. If a wolf is on private land and wolf kills livestock, that wolf should probably be destroyed. Should the wolf be delisted? If it helps the wolf's PR then yes, if it doesn't, then my answer is no.

L0225: We oppose delisting of the wolf and support the no action alternative. What few livestock they kill can be paid for.

L0229: We support alternative 3 because it sets the number of breeding pairs at 20 before changing management strategies from conservative to liberal, provides full legal protection for wolves and sets clear and specific rules for when citizens can kill wolves that are threatening livestock.

L0275: McCone County will pass a resolution declaring that the wolf is an unacceptable species. Development of alternative 2 did not go far enough in protecting the livelihood and lifestyle of the eastern Montana ranching community. FWP is reliant on the hunters who pay the license fees, which in turn pay for Montana's wildlife. Will support alternative #2 with language from alternative 4 added to improve the alternative. We believe a cap at a minimum number of breeding pairs and social groups above the delisting level should be adopted. We also believe that wolves should be zoned out of eastern Montana. And off private property with more management and control carried out by landowners should the wolves cross out of their zoned areas. No wolves should be introduced or recovered in areas east of FWP region 4 and 5. Special kill permits should be granted automatically whenever a wolf preying on livestock has impacted a landowner. Livestock producers in eastern Montana have already been skeptical of FWP and fear that breeding pairs of wolves may already have been or will be slipped into their area with no public information. Many of FWP's programs are dependant on landowners' support and participation. We urge you to keep on whether the language discussed above is or is not included in the preferred alternative.

L0281: Valley Countys' #1 resource is agriculture with the revenue our businesses receive from hunting not far behind. Alternative 2 is 15 breeding pairs which, with the maps provided, could be easily accomplished with where the wolves are located now. We are very adamant that we do not want wolves established in Valley County. We have been told that if you allow wolves in Valley County, landowners will pull their acreages from the Block Management program. Landowners who allow hunting have said they will close their property to all hunting. We realize it is critical that we get the wolf delisted and feel you can do this under Alternative #2. Establish a zone for the wolf population. Give more flexibility for central and eastern counties. Wolves should not be allowed to establish themselves east of this line. A much more stringent management plan should be in place for breeding pairs that migrate. We would like to see the wording in Alternative #4, page 91, added to Alternative #2. Wolf distribution would be artificially zoned so that wolves would be strongly discouraged in central and eastern Montana and may in fact be routinely trapped and relocated to Western Montana or removed from the population if suitable release sites could not be found. Wolf presence in Regions 4 and 5 should only be allowed in the areas on our map. However, individual landowners would carry relatively more responsibility for management activities on private lands in lieu of agency response compared to Alternatives 2 and 3. FWP will provide as many special kill permits as possible to interested landowners for wolf control actions on their private property. Pat Sinclair will still respond to wolf-livestock complaints, provide technical assistance to landowners, and aid in restricting wolf distribution to western Montana.

L0287: The Montana Stockgrowers Association (MSGA) currently has the following three policy directives on wolf management:

- 1.Ensuring livestock owners are able to defend their animals from wolf attacks
- 2.Immediate delisting from ESA with state management and adequate funding provided by the federal government
- 3.Livestock owner's ability to control wolf depredation on federal lands in a manner similar to that permitted on private lands.

With the previous policies in mind, MSGA reviewed the range of alternatives and compiled the segments of different alternatives that coincide with our policy.

Table 30 on page 102 of the document gives a comprehensive summary of the alternatives and Table 43 on page 148 is useful for future environmental consequences. MSGA used these tables to determine which segments of alternative #2 and alternative #4 best address livestock industry concerns.

Under Wolf Management and Distribution, alternative #2 identifies the trigger of 15 breeding pair as the benchmark for the technique that will be applied to control the population. MSGA feels that this trigger should have some flexibility, under the discretion of the FWP Commission. If it is determined that wolf depredations reach a level higher than expected before the trigger is met, the Commission should have the ability to adjust this benchmark to react more quickly. Distribution of wolves need to take on more of the properties of alternative #4. Wolves should be encouraged to stay in the western portion of MT and the population that expands into eastern MT be more aggressively managed. Alternative #4 also states that more management and control will be carried out by landowners, this language should be included into #2, but in conjunction with MDFWP.

Under the section of Funding, our policy states the need for adequate funding from the federal government. This would be achieved through either Alt. #2 or Alt. #4. The balanced approach under Alt. #2 seems reasonable; however, MSGA is concerned that the private sources or contributors may interject views on management that are not consistent with the direction intended by the people of Montana. MSGA feels your agency should continue to pursue the idea of a trust fund for the tri-state area to manage all large predators. The possibility of adding a \$5 surcharge on the National Parks to create a fund would generate sufficient dollars spread across a broader range and not place an undue burden on the citizens of Montana.

The Livestock section needs more emphasis on allowing more liberal special kill permits and Wildlife Services more latitude to address wolf/livestock conflicts. The MDFWP may not need to go to the degree of permits that risk the population dropping below designated objectives, but liberal enough to address these problems quickly and efficiently. Funding for preventative initiatives should also be addressed. On page 78, it is stated that "some funding could come from monies FWP already provides to WS for animal damage management in cooperation with MDOL." The funding currently provided to WS for predator control would not be sufficient for both programs, so additional money would have to be allocated to address the wolf management.

The Wolf Habitat, Connectivity and Land Management section relates back to wolf distribution. By placing more efforts toward containing wolf populations in western MT, it will continue to allow a habitat corridor by which wolves will be able to disperse into the tri-state area and Canada, and reduce the wolf/livestock conflicts in the eastern part of the state.

Compensation needs to be included in the adopted wolf management plan. MDFWP is best positioned to act as the coordinator for the development of a compensation plan. It is stated in Alt.#2 that no FWP or Montana general fund money will be used to fund a compensation program, but it is essential that your agency take the lead in setting up the program and secure an adequate source of funding to cover the anticipated losses that will occur.

Economics and Livelihoods in chapter 4 are similar under all of the alternatives where it is stated that "estimated losses are small compared to the entire industry, not spread evenly among all producers and the losses may be significant in proportion to the size of the operation." The MDFWP must be prepared to accept the liability if these losses are too great and force an operation out of business. The ranching industry operates on a thin margin of profit and livestock producers forced to absorb these significant losses may have no other options.

The Information, Education and Public Outreach segment of Alt.#2 would be much more beneficial if the language of "increased interaction with landowners to notify when wolves are in the area" was included as stated in Alt.#4. To reduce costs, the MDFWP would not necessarily have to contact each and every landowner in an area, but relay the latest information to the local game warden or county commissioners. A simple phone call to a central location that could be accessed by the public may help in reducing the number of wolf/livestock conflicts. This improved communication will increase your agency's credibility and mitigate any costs associated with this undertaking.

Monitoring was not adequately addressed under Alt.#2. Although the USFWS is the lead agency in monitoring the wolf population in Montana, their accuracy in documenting numbers is questionable. During one of the open house meetings this spring, a MDFWP employee stated that

the documented population was 183 wolves; however, the number may be closer to 300! This type of discrepancy is not acceptable as management becomes the responsibility of the state. Telemetry, although expensive, will be an important tool in determining an accurate count of the wolf population. Because the entire preferred alternative is tied with the control techniques and the number of breeding pairs present in Montana, monitoring will be the key to success.

MSGA would also like to comment on the proposed budgets for MDFWP to manage wolves. All of the proposed budgets are within the \$800,000 range and have deviated very little from the original 2002 draft wolf plan. MSGA still feels that the additional 4.3 FTE wildlife division staff and the 2.5 FTE enforcement staff are not warranted. The MDFWP may need one additional biologist to address the new responsibilities of wolf management, but current MDFWP biologists should be able to incorporate the presence of wolves into the management of the species already under their supervision. Also, there are current enforcement officers already in place to address fish and game violations, if your agency feels the enforcement division is not adequate, MDFWP needs to research funding for additional positions through other sources. Within Alt.#2, MSGA feels it is important to redistribute additional funds toward preventative efforts and depredation. By reducing the hiring for suggested positions, more funding can be allocated to reducing wolf/livestock conflicts and when conflicts occur, have adequate funding to quickly address those conflicts.

All of the time and effort put forth to develop a management plan by the state of Montana may be put on hold while the court system sorts through the lawsuits and appeals and for this reason it is important to include Alt.#5. MSGA feels it is reasonable to have a "fall back" plan to allow for the transition to a full delisting of wolves. MSGA is concerned that if the MDFWP is required to adopt this alternative, your department and the USFWS joint management will remain well into the future. It would be detrimental to our state if your department got caught into a management effort similar to grizzly bears, MSGA has contended all along that the MDFWP should have sole responsibility of management of wolves.

In conclusion, thank for the opportunity to comment on the Montana Gray Wolf Conservation and Management Plan. MSGA believes through continued cooperation, a workable management plan can be developed and the delisting process can be completed.

L0290: I am a landowner and livestock producer in Petroleum County, in central Montana and I am vehemently opposed to having wolves running loose anywhere in our state, and especially in my backyard. Wolves are high-powered killing machines which is the reason they were eradicated by the early settlers in our state. I consider wolves to be absolutely unacceptable anywhere in the State of Montana with the exception of Yellowstone Park. Allowing wolves to repopulate the State of Montana is completely irresponsible. I fear that having one of the wolf management alternatives rammed down our throats will cause MFWP/Landowner relations to seriously deteriorate. Successful programs such as the Block Management may suffer. We must continue to work together to manage the wildlife of Montana in the best interest of all citizens, not just the vocal minority pushing reintroduction of the wolves. Please consider that my land, my livestock, are more to me than just a way of paying bills. It is my livelihood; a way of life I hope to pass on to the next generation. I trust you to listen objectively to all comments, and to make a reasonable and informed decision on this matter.

L0295: We urge MFWP to consider and adopt alternative #4. We are extremely concerned with the impact of the growing wolf population. We would rather have seen a continuation of existing numbers of the wolves before reintroduction, but since that isn't a choice we have alternative #4 would be better than the other choices available. Limiting the wolf pairs to 10 might give a fighting chance to sustain the elk, sheep and deer populations. In the history of our state it has been proven that wolves are predators that devastate wildlife populations and the surrounding ranches and their livestock. How can this be a good all-around plan? Being a good steward of our land is an important job worth doing well. Please consider limiting wolves.

L0299: We fear that no wolf control guidelines are adopted, we could lose significant number of cattle to predation. FWP must be able to control the number of wolves. Livestock owners or private citizens whose person or property are threatened must be able to kill wolves without threat of prosecution. Animal control officers must be able to quickly kill offending wolves before they kill again. The number of breeding wolves must be kept to a minimum. Cost to manage wolves should come from the federal government and pro-wolf groups, not the state of Montana.

L0309: Indian Butte Cooperative State Grazing District does support resolution #6-2003 made by the Fergus County Commissioners, which prohibits the presence, introduction or reintroduction of wolves within the boundaries of Fergus county. IBCSGD is involved in the block management program and a wolf population in Fergus County would affect our decision to continue in the program. Some of our pasture allotments include 5000-10000 acres and it would be impossible to keep our cattle from becoming prey animals. In order to make a profit in present day ranching, it is very important to keep every possible cow, calf and bull alive. This area of Fergus County is abundant with antelope, deer, elk and other wildlife. A wolf population would adversely affect this wildlife population. The income from hunting and tourism would drop drastically.

L0310: Alternative 4 of the FWP plan would be the best option we have. For most folks that have reached maturity, they fully realize that the entire wolf reintroduction plan was a gross mistake and remains a bugling mess. Since they have re-introduced as great expense, the problems have been numerous and any measure of success is not in evidence anywhere. Wolves have been recognized world wide as the most cruel of predators. It is only a matter of time when they will have to be removed once again because there is nothing in the entire re-introduction program that is really working. The only effect this program has on the ecology has been without good effect. The sooner this program is downsized the better off all taxpayers will be. Sometimes we must step backwards to make progress. Ranchers and others effected have enough problems without such a whim being imposed on them.

L0313: Every wolf pack that has come in contact with domestic livestock has eventually had conflicts resulting in direct or indirect losses to those livestock. Since the perpetuation of Montana's wildlife depends on the habitats of Montanans private lands we feel the following criteria must be incorporated into the wolf management plan for Montana. Wolf numbers must be the absolute minimum to satisfy relisting the wolf. Recognize the wolf is a predator and livestock producers must have the right to protect their livestock on private and public ranges, using preventive and reactive methods. Damage caused by wolves must cover confirmed and probable kills and also all indirect losses from wolf conflicts. Compensation is not acceptable and should not release those responsible for the accountability of reintroducing the wolf and the damages caused by their actions. Management of the wolves should be directed to maintaining the minimum number of packs to prevent re-listing and also establish a maximum number of packs Montana has to tolerate and provide wildlife and livestock as its prey base.

L0322: Updated Council version of the wolf plan seems to be the most logical approach. Wolves should be delisted now, as a healthy population exists. Hunting of wolves should be allowed, with changing annual quotas dependent on current populations of wolves, deer, elk, and moose. Manage wolves as mountain lions are managed. Fees collected by the state of Montana for wolf permits/licenses could be used to help pay the cost of annual data collection on wolf, deer, elk, moose populations. Other costs related to wolf management should be paid by U.S. Fish and Wildlife Service, as it was a federal program, not one requested by the voters of Montana. Livestock owners should be able to protect their livestock before there are losses

and should be compensated for losses. There should be authorities (federal and state wildlife people) available in every county that has wolves, so they can respond immediately when there is conflict with wolves.

L0324: I support your proposed alternative 2 with substitutions from alternative 3. Fifteen breeding pairs are too few. Please consider increasing this minimum number to no fewer than 20 breeding pairs per federal recovery definition. This would also help offset illegal killing of wolves. I can live with the shooting of wolves (big game animal status) albeit with grave concerns regarding decimation of this species' social structure, as we did with coyotes. But I strongly urge you to NOT allow trapping (furbearer status) of wolves. Please delete trapping by other than wildlife management professionals from acceptable methods of controlling wolf populations and/or problem animals. The 72-hour reporting requirement when a wolf is killed or injured in defense of life or property SHOULD be shortened to the federally required 24 hours. Kudos for increasing efforts to reduce the risk of depredation and implement more proactive livestock management strategies. This is long overdue. Adequate funding needs to be in place BEFORE this plan can be implemented. If funding becomes insufficient, compensation for livestock losses should be the first item to be cut. Special kill permits for livestock producers should NOT be issued to remove wolves on public land regardless of wolf numbers being high or low.

L0332: We already have enough adversities in this area and are really not really willing to add another problem for our livestock and abundant wildlife that is already in place here. We would be in support of alternative 2 with the following changes: Support 12 breeding pairs where they were originally introduced. Suggest that wolf distribution be strongly discouraged in central and eastern Montana and may be routinely trapped and relocated to western Montana or removed from the population if suitable release sites could not be found. In favor of individual landowners carrying more responsibility for activities on private lands and the FWP providing as many special kill permits as possible to interested landowners for wolf control actions on their private land. In favor of WS responding to wolf-livestock complaints, providing technical assistance to landowners, and aiding in restricting wolf distribution to western Montana.

L0334: We are in favor of it coming off the endangered species and going to state authority. It is a devastating predator to our industries in eastern Montana - our livelihood involves chiefly cattle, sheep and horses. It is extremely hard to make ranching pay the bills now without fighting wolves. Also it will be a tremendous loss to hunting, as the wildlife numbers will really diminish with the wolf coming in. Probably most of the hunting areas will be closed off to hunting if this happens. It will most certainly affect the economy of the county because more and more ranches will have to go out of business. Keep them out of central and eastern Montana. West of the mountains is OK, but please keep them away from us.

L0340: 1) Wolf management should be under Montana state control only as we are the people directly affected by them. Consequently it will be more expedient to handle problems ourselves. 2) There should be NO difference between private ground and federal ground when problem wolves need to be removed. Meaning livestock producers can kill problem wolves on leased, BLM, Forest Service etc ground.

L0341: 1) Alternative #2. 2) Needs provision in the plan to address wolf control for those counties that do not use Wildlife Services. There are at least 5 counties in the state that do not use federal predator control.

L0117: 1) Alternative #4 minimum wolf is best. Why? 1-less wolf-livestock conflict. 2-less wolf-human conflict. 3-federally funded versus sportsman's dollars. 4-decreased predation of big game herds ensuring stable big game license sales. 5-decreased stress on big-game herds on winter range at the end of a harsh winter. 6-better protect sensitive ungulate populations of bighorn sheep and moose. 7-increased recruitment rates due to higher calf, fawn, and lamb survival rates. 8-increased hunt opportunities, outfitter business, and other economic benefits. 2) I support the position of the Montana Shooting Sports Ass. Concerning the wolf management EIS. It is imperative that MFWP adopts a plan that represents those groups who have born the costs of wildlife conservation in this state -- Montana's hunters and stock growers. The final plan. Most similar to alternative 4 minimum wolf, must reflect the intent of our state legislature and be consistent with HB262, HB306, HJ32 and SB209 and preserve Montana's hunting heritage,

L0030: 1) Alternative 4. Estimates in other plans on livestock losses and wildlife reductions (elk & moose) are too low. Funding from Montana should be less than 10% or the same % as the population of Montana is of the US. 2) I would increase the breeding pairs to someplace between 15 and 20. Confine the wolves to National parks and wilderness areas as much as possible.

L0064: 1) I prefer alternative #3. It allows immediate protection of private property. Allows hunting and trapping of wolves and allows more wolves available for hunting, trapping and will bring more revenue. 2) NA.

L0069: 1) Alternative #3. I like this alternative the best due to the larger benchmark of 20 breeding pairs. In addition having to the comment meeting in Gardiner I realize that ranchers want to have some tools and abilities to respond to conflicts. 2) I would prefer that if the state and landowners are given the permission to kill or hunt wolves that trapping would be disallowed. I feel that trapping is unnecessary inhumane. Also I don't believe that wolves should be killed in order to protect cattle that is grazing on public lands.

L0101: 1) Wolf should remain on federally threatened list. Let FWS manage wolves. Let the people who study wolves have the biggest say how wolves should be managed. Let stock growers who graze on public land pay for wolf up keep. If they graze on public land, they get no compensation, that's the price they pay for doing business on public land. 2) Full implementation public and private. Livestock belong to individual and companies but wolves belong to all Americans so let the government fund the wolves. Do not pay anyone that build a home near forest and public land for their pets. If they want to live in the wild they have to accept all that goes with it.

L0102: 1) Alternative #2 because it allows farmers to deal with them if needed and the cost is okay. 2) Alternative 5 federal government covers 90% and state of Montana covers 10% and put that on alternative 2.

L0114: 1) Eliminate all wolves as soon as possible. They are dangerous/vicious. They hunt cows, have killed or are standing long while cow herd awaiting birthing. The true cost will come in the cattle harvested, cattle lost. 2) The entire idea of wolves was an outrageous waste of taxpayer money.

L0331: Thank you for the opportunity to comment on the Montana Gray Wolf Conservation and Management Plan Draft Environmental Impact Statement (Draft EIS). Please accept these comments on behalf of Defenders of Wildlife (Defenders) a non-profit wildlife conservation organization based in Washington D.C. With offices across North America including Missoula Montana. Founded in 1947 Defenders has more than 400 000 members and supporters across the nation including over 3 000 in Montana many of whom reside within the historic and current range of the wolf.

Defenders is dedicated to protecting and restoring all native wild animals and plants in their natural communities. To this end Defenders has invested significant time and resources into restoring wolves in the northern Rockies and other regions. Our efforts to restore wolves work collaboratively with stakeholders and help reduce conflicts related to wolf recovery spans several decades. Since 1987 Defenders has compensated 227 livestock growers \$272 354.25 through The Bailey Wildlife Foundation Wolf Compensation Trust. In Montana alone over the sixteen-year history of the Trust we have paid \$112 871 for 150 cattle 293 sheep and less than a dozen llamas livestock dogs and miscellaneous livestock. Beyond compensation for livestock losses we believe the best approach to protect wolves and landowners is to prevent depredations before they occur and work collaboratively to provide alternatives and deterrents that resolve conflicts through non-lethal methods. Through funding provided by The Bailey Wildlife Foundation Proactive Carnivore Conservation Fund this work includes cost-sharing the purchase of livestock protection dogs radio activated guard alarms fencing hay and alternative grazing support and coordination of the Defenders¹¹ Wolf Guardian program to provide volunteer labor to assist in utilizing these and other non-lethal deterrents. Our volunteers have assisted numerous wolf packs and landowners throughout Idaho and Montana. Though the number of wolf depredations is quite small (less than one half of one percent) in comparison to other losses we feel the investment of our time and resources has created more tolerance for wolves and helped us form better working relationships among those who share the land with wolves. We continue to seek and implement new ideas that further the recovery and long term acceptance of wolves in their native territory. Wolf management and long term wolf population viability is of great importance to our organization and the members we represent. Comments on Alternatives MTFWP Preferred Alternative 2: Alternative 2 includes some favorable components such as enhanced ecological research interagency and tribal coordination and monitoring. However we oppose the liberalized lethal control and hunting of wolves as identified and described in this alternative. In particular we believe §proactive removal of potential problem wolves§ places the wolf population in jeopardy by killing wolves before there is any evidence of depredation or any attempts to prevent depredations. It is our belief and experience that working with a stable wolf pack can be more predictable and thus management to reduce or prevent livestock attacks can be more effective. If established wolf packs are eliminated new wolves will colonize the same habitat and the problems may continue or even increase. By working with livestock owners and wolf experts we believe non-lethal proactive methods in many circumstances can prove far more effective than lethal control. Under this component of Alternative 2 however the rush to implement lethal control of potential problem wolves may compound the problem. If these circumstances were to be adopted as standard management of wolf conflicts Defenders would strongly consider withdrawing our financial support and resources for compensating livestock owners. Unfortunately Alternatives 2 (and Alternative 3) are also too lenient in allowing the lethal take of wolves simply for threatening to kill livestock or pets. It is an especially troubling provision when applied to wolf management on public lands. This standard is far too vague and would allow for varying and liberal interpretation essentially permitting any livestock or pet owner to kill wolves simply for being present but without requiring evidence of depredation intent. The final plan should allow for the use of only non-lethal deterrents in the case of wolves threatening livestock and pets. It should not permit lethal control based on individual interpretation of what constitutes threatening conduct by wolves.

Defenders Preferred Alternative Defenders supports a modified Alternative 3 with the addition of a livestock and livestock guarding dog compensation program and a proactive non-lethal depredation management program to assist livestock owners in co-existing with wolves and other native carnivores. Though we understand the concerns stated regarding challenges and limitations of compensation programs many of those identified can be adequately addressed and the social benefit of such a program outweighs the limitations. We would work with the state of Montana and other entities to share funding new ideas and management sources for these programs. Examples of innovative ideas that could provide a source of funds include a Montana State wolf license plate or voluntary recreation fee. Defenders believes it would be inappropriate to create a sport-hunting season on a newly delisted species. This component should be eliminated from Alternative 3 and replaced with provisions for non-lethal harassment. Citizens should not be allowed to kill wolves except in situations of protecting human safety which are extremely rare. We favor the creation of the proposed annual workshop and interagency coordination meeting. We also hope the state of Montana will become a partner in the existing annual North American Interagency Wolf Conference currently cosponsored by the US Fish and Wildlife Service National Park Service Wolf Recovery Foundation and Defenders of Wildlife. Should a state advisory council be continued we would appreciate the opportunity to serve as a standing member of this committee. Both alternatives 2 and 3 offer fundamental strengths that we support and appreciate. These include: No artificial cap or limits on maximum wolf numbers in Montana. No artificial boundaries that exclude wolves from suitable habitat in Montana. No immediate hunting of wolves following delisting. Law enforcement protection for wolves identified as high priority¹² when pack numbers are low. Increased habitat enhancement projects. Integration of ungulate and carnivore management that is more holistic by approach. An emphasis on non-lethal proactive management methods when wolf numbers are low. Diverse stakeholder involvement in the development of this plan. Our comments are based not only on the presented alternatives but also on Defenders general criteria for state wolf management. Whatever plan is adopted in the final EIS it should include the following criteria in clear authoritative terms: Any provision authorizing the incidental take (i.e. Killing) of wolves must be restricted to takings that are unintentional and which occur in the course of conducting an otherwise lawful activity. All authorized take must be subject to avoidance minimization and mitigation requirements. Any incidental take allowed pursuant to the plan must not appreciably reduce the likelihood of survival and recovery of wolves in the wild and must be adequately monitored by the state. The plan must be adequately funded and contain provisions to deal with unforeseen circumstances. Assurances must exist that the plan will be implemented. No artificial limits on maximum wolf numbers or boundaries within a state. No immediate hunting of wolves. Each state must demonstrate that it can manage wolves at sustainable numbers and protect them from illegal or high level of take that could threaten the population. Minnesota for example proposed a five-year moratorium on any wolf hunting as part of its management plan. A focus on non-lethal methods of control for standard conflict management. This should include deterrents like alarm systems prompt removal of dead or sick livestock to avoid attracting predators increased use of guard dogs herders and range riders when appropriate and relocation of livestock from chronic problem areas on public land when other methods are unsuccessful. Lethal control of wolves should only be allowed when all other non-lethal methods have been exhausted. Public education on the importance of wolf conservation and on-going opportunities to participate in wolf management decisions and recovery efforts. Adequate mechanisms to accurately monitor wolf populations on an annual basis. Protected status for wolves under state law until all recovery goals are met and sustained. The current alternatives allow the state to reclassify wolves as a big game species based on vaguely defined criteria that could threaten the wolf population. For states to live up to their responsibility as the primary caretakers for wildlife within their borders each must develop a management plan for wolves that includes the standards listed above. Without such a plan the state will jeopardize years of hard work restoring this keystone species to its native habitat. Defenders believes that humans and wolves can coexist with a minimum of conflict but it will take dedication and planning on the part of the state and its citizenry. We appreciate the comprehensive public comment opportunities of this EIS process. We hope our concerns will be considered and efforts made to ensure the long term viability and humane conservation of wolves in Montana. We look forward to working with the state toward this goal.

E11: In reference to specific alternatives I prefer alternative 3 simply because the breeding pair benchmark is higher. I think that a benchmark of 20 as opposed to 15 would put Montana wolves at a safer distance from the prospect being classified as endangered again. Overall I am concerned with the alternatives that allow for lethal take of wolves for threatening livestock. Every person's definition of threat is a little different which makes me feel that this concept is too ambiguous to allow for the lethal take of wolves. I believe the alternatives are too lenient for allowing people to kill wolves for threatening their livestock especially on grazing allotments on public land. Lethal control should always be the last resort. Though I prefer alternative

3 I do have concerns for this alternative. I am concerned about there not being a compensation plan under this alternative. I believe that a compensation program is necessary to keep everyone happy. I also think that under all the alternatives that there should be incentives for citizens who are working to reduce or avoid conflicts between their livestock and wolves. Since wolves are here to stay it is important for livestock owners to demonstrate responsible animal husbandry practices such as removing dead livestock carcasses treating and removing injured or diseased animals and avoiding active wolf den sites. Also I believe that the state of Montana should continue to have a wolf management advisory committee to continue to identify discuss and discern management goals aid in resolving conflicts and to educate the public.

E12: 1. Recovery goals should be based on viable self-sustaining populations without an artificial cap. The draft plan is too lenient in allowing the lethal take of wolves simply for threatening to kill livestock or pets-especially on PUBLIC LANDS. The final plan should allow for only non-lethal deterrents in the case of wolves threatening livestock. Lethal control should only be used as a last resort when other methods have been exhausted and failed. Reasonable incentives for citizens working to reduce or avoid conflicts should be considered and adopted. It is important that livestock operators and owners also demonstrate responsible animal husbandry practices including the removal of dead livestock carcasses and avoiding active wolf dens. Include a provision for a state wolf management advisory council to continue to identify discuss and discern management goals conflict resolutions and public EDUCATION opportunities. Begin wolf management training for wolf biologists prior to delisting. Training should prepare biologists for management including radio collaring and monitoring wolves. Stronger penalties for ILLEGAL take of wolves. Identify reasonable and appropriate funding strategies for state management by working with stakeholders. 2. Alternative 1 would be the closest and most appropriate.

E15: 1. Our family has been using livestock as a tool to manage the health of the range resources we control in southwestern Montana and southeastern Idaho since the 1880's. Agrarian societies and wolves have never been compatible. This is why wolves were removed from agrarian communities in the United States and in the rest of the world. Wolves were pushed back into areas that were not utilized by livestock. The Endangered Species Act was used by extreme preservationists to bring the wolf back and cause land use changes. Much of the private land in the western United States is used for livestock production. When the wolf forces livestock off these lands this land will be sold to wealthy recreation interests and the wildlife habitat will be fragmented beyond recognition and the openness of the West that draws people will be lost. Most of the public lands are intermingled with private lands that contain the most productive and valuable habitat. My comments on the preferred alternative are being made recognizing the above realities and the past inability of the Montana Fish Wildlife and Parks (MFW&P) to control wildlife numbers and failure to recognize and adequately compensate landowners for their contributions to wildlife habitat and the coffers of this state. These comments are being made on the Preferred Alternative as presented in the Executive Summary. Wolf Management The wolf will fall under the same category as the black bear and mountain lion yet presents a much greater problem than these two species to the game herds and the livestock industry. All a wolf needs to survive is something to eat. The wolf will be much more difficult to control. To suggest that they can be managed the same is unrealistic. The wolf should be put in a separate category that recognizes that he is nature's primary killing machine and design tools that can address and compensate for his impact. The MFW&P is going to ask for compensation for an illegal harvest of a wolf but refuses to pay for livestock taken by a wolf or ask for compensation for wolf takings of other wildlife. This needs to be addressed. Number of Wolves in 2015 How can we depend upon these numbers? I well remember the numbers proposed for the MDFW&P elk plans. The plan needs a mechanism that will make MFW&P liable to the hunter and the livestock industry if these numbers are not held to. Distribution in 2015 All distribution will be localized and as the prey base of wild ungulates decreases wolf will be forced to target livestock and pets on private lands and in more populated areas. If statewide distribution is being considered this plan is much bigger than being portrayed. We need specific population areas and numbers otherwise we will have more numbers than needed to satisfy the USFW and the MDFW&P have a dismal record in managing numbers especially elk. Wolf Habitat connectivity Land Management when the wolf was first being introduced the USFW Service met with the ranchers and assured them that the wolf had limited habitat requirements. This heading supports the preservationists' goal in using the wolf as a takings weapon: "Connectivity assured through legal protection". It looks like the MDFW&P is going to use the wolf to manage land. This is outside their legal authority but is increasingly becoming their intention. This section of the plan should be dropped because the nature of the wolf makes it unnecessary. Private Property the implications of having wolves versus other publicly-owned wildlife on private land is not comparable. One must understand that the wolf is the ultimate predator whether classified as such or not. Once the wolf is delisted it becomes the responsibility of the State of Montana and managed by the MDFW&P. Forcing the private landowner to accommodate a wolf limits his ability to use his property as he wishes. This is a takings and since the wolf is delisted and Montana is responsible Montana will incur tremendous liability. This liability must not be accepted by Montana in this plan and the federal government and/or the successful petitioners must be held responsible. This issue could break the state of Montana. Compensation As discussed under private property when the wolf is delisted it becomes the responsibility of the State of Montana. Originally the wolf was eliminated from Montana because it was not compatible with the other land users. This was a cooperative program with the state. The wolf is the supreme predator and cannot be compared or treated like other predators or game animals. As wildlife numbers decrease or move onto private land for security the wolf will follow and the numbers of livestock losses could explode. It is imperative that the state of Montana and/or the federal government be held responsible for the total costs of livestock losses. This will assure that Montana and the federal government will responsibly manage this negative impact of wolf reintroduction. The rancher already supplies a big share of habitat and feed for the state's wildlife are we also obligated to supply the meat to support the wolf? All livestock losses from wolves exceeding that predicted in 2015 under the preferred alternative in table 3 should be paid by the state or federal government. Economics Livelihoods This section is poorly addressed. The potential economic impact to livestock operations and the resulting change in land ownership patterns is immense. No attempt to understand the current financial stress of the public land livestock industry is apparent in this plan. No guarantees are made as to the efficacy of the plan to control wolf depredation. The private landowner is left to fend for himself with few tools. No consideration has been given to the impact to Montana and wildlife habitat as ownership patterns change due to the loss of a viable livestock industry. This wolf management plan could directly contribute to these potential changes. Takings of private property private property rights and livelihoods is generally being ignored. This section needs to be expanded. MEPA NEPA requirements All the ramifications that this Wolf Conservation and Management Plan will have on the livestock industry landownership patterns county economies the support of the county infrastructure other wildlife and hunting opportunities and subsequent revenues have not been addressed to the extent required by MEPA and NEPA. What is especially of concern is the unwillingness of the MDFW&P to accept responsibilities of the management of the wildlife under their direction and mitigation for the damages and impact cause by this wildlife. The politics of the Endangered have the potential to destroy all that we have worked for in Montana. It is important in this plan to force those responsible for this dilemma to mitigate the consequences. This is the only way we are going to stop this madness that will ultimately end up with single use of the resource by those who refuse to accept the responsibility of ownership. 2. see above.

E16: 1. Although I am Currently not a resident of Montana and don't even own property in the State anymore I still am In Montana on a regular basis throughout the year.. As I know this comment will not be regarded as applicable do to not living there at this time I wanted to relay my thoughts anyway I hope they will help in the process.. As a Livestock owner I can see where the introduction of these animals can and will continue to be a hardship on the farmer/ rancher. Taking that in consideration I would think that the Updated Council Plan to be a very good and effective plan to put in place.

Although the Enviro. movement will probably disagree. I have been involved for many years in trying to restore the Cedar River Basin through designing a Basin Plan & through the Cedar River Council which I was a member for many years. We have made great strides however no matter what one does for some it is just not enough. They will never be satisfied until all of this country is the way they feel it should be. Again I want to commend you for your efforts and hope that this plan is put in place so we can move on with managing these animals in a way that they will fit in with the rest of the creatures that we want to support and Harvest. 2. The only thing that I would add is that I hope a good plan can be implemented for helping livestock owners to recover the lost revenue from the certain continued attacks of these wolves in the future.. There are cost to all endeavors including Ranching & Farming and one can not be at the side of there livestock 24/7. Wolves are not stupid and so why would they chase down a deer or elk if they can walk up to my cattle and take one out easily.. Breaking that trend will be a large problem I am sure. Just taking them to another area will not solve the problem typically. Again Thanks For All Your Efforts. We who pay to hunt and fish appreciate your efforts.. Thank You

E19: 1. I believe wolves can a nuisance to ranchers but there are alternatives for the wolf and it's existence. One of ideas would be to ask the ranchers to build a good quality fence around there land or pastures where the cattle are. The strong fence would act as a protection. I know it would be a lot of money to actually be able to buy a very good quantity of fence but MAYBE a little government funding could help with the some costs. Set up some advertisements to help get funding and donations to help pay for the fences that should hold & protect the ranchers cattle. I'm sure a lot of people out there love wolves and would help with their donations. Then if the wolves at anytime get through the ranchers fences damage or not then the ranchers should have the right to destroy them. I think the Ranchers need to be more self motivated about protecting their cattle. Cows are easy game and the fences are also easy to cross. I would modify the ranchers SELF MOTIVATIONAL SKILLS. 2. Another suggestion would be to take the wolves from birth and raise them like pets like dogs. This would take along time but in the long run maybe wolves wouldn't have to depend on the ranchers cattle to a food source but rely on humans to feed them dog food & water. The first dog ever was just as wild a wolf. Dogs originated from wolves. If the dogs can do it then so can the wolves. In the long run of course. Wolves need a little help to understand and a little civilizational skills that could happen eventually over time and maybe soon they wouldn't be such a big problem.

E50: 1. Updated Council--Alternative 2 Wolves as long as we have to have them should be managed by the State. This is the best balance of the alternatives. I am most concerned about the impact of wolves on livestock producers. Funding should not be at the expense of other FWP programs. 2. ok as is.

E56: 1. I feel that Alternative 3 has the best chance of succeeding in maintaining a viable wolf population over the long haul. It sets a minimum of 20 breeding pairs; it sets no artificial limits on the wolves' boundaries; adequate state funding must exist to carry out the protection policy; wolves can only be eliminated if they present an immediate danger to livestock. 2. Since wolves are responsible for less than 1% of the livestock losses in Montana I feel that the livestock protection issue is way over emphasized. Also eventually wolves and other wildlife will be the biggest source on income based on tourism in states such as Montana Idaho etc. Nothing should be done to jeopardize such natural sources of state income.

E61: 1. Alternative 2 gives landowners means to control (within reason) the safety of his livelihood and be compensated for losses. 2. Would riders and ranch employees who are responsible for livestock have the right to use kill permits as well as landowners since they would be likely to observe conflicts? I think that when livestock is killed injured or threatened the entire pack should be eliminated to prevent additional losses expense and time.

E76: 1. Alternative number 4 Minimum Wolf because as a rancher I feel we need to have an aggressive management check on wolf population growth and restrict wolf distribution to enable livestock producers to limit livestock losses due to wolves. 2. By having livestock owner's be able to kill wolves on site if livestock is being harassed or killed.

E78: 1. I support the implementation of Alternative 2 – Updated council (Preferred Alternative). This is a thorough and solid plan that I believe will ensure the persistence of wolves in Montana while adequately addressing the potential environmental and social impacts of a recovered wolf population. 2. Please consider the following comments in regards to the draft wolf environmental impact statement: 1. In the section titled Prey Populations it is stated: “If reliable data indicate that a local prey population is significantly impacted by wolf predation in conjunction with other environmental factors FWP would consider reducing wolf pack size.” Given that prey populations naturally fluctuate in response to a variety of different environmental and biological conditions I believe that it is important that you clarify what is meant by “reliable data.” Of course it is reasonable to believe (and has been shown) that prey populations have declined due to predation and in some cases wolf predation may serve as an additive factor. But predators are often the first to take the blame for perceived declines in prey populations and significant pressure is often put on managers to control predators in these instances. Indeed predators are easier to control than the weather or disease. But ecosystems are complex and it is often difficult to tease out the effects of predation on prey populations even after multi-year studies. I foresee wolves often taking the blame for declines in prey populations and therefore highly recommend that FWP clarify what kind of data are going to be used to sort out this issue. 2. In the section titled Livestock/Compensation I have 2 issues to address regarding 1) identification of individual problem wolves and 2) use of selective removal methods. In the 4th paragraph it states: “Management actions will be directed at individual problem wolves.” Although this is a logical approach it has proven difficult under USFWS management to identify individual wolves involved in livestock depredations. Attempts have been made to identify problem wolves but many control actions have resulted in non-selective removal of wolves from implicated packs. Also in paragraph 4 it states that: “Non-selective methods such as poison would not be used.” No mention is made of aerial shooting of wolves as a potentially non-selective method and this needs to be addressed. Aerial shooting of wolves has been one of the primary control methods used by WS but I would argue is one of the most ineffective and non-selective tools to manage depredating wolves unless the goal is to remove the entire pack. I believe the best long-term strategy for managing depredating wolf packs is to attempt to create a control situation whereby remaining pack members may learn from the event. Packs that undergo partial removal by aerial gunning do not experience any learned behavior in associating depredation behavior with the removal event because control often takes place away from the depredation site. I believe the concept of learned behavior needs to be taken into account in how lethal control is carried out because aerial shooting of wolves is extremely expensive and a waste of state and federal money unless conditions do not permit an alternative option. Therefore due to the combined problem of properly identifying problem wolves and conducting selective removal I recommend the following approach to lethal control in situations where livestock are kept in confined pastures (most private land situations). 1.) If problem wolves can be identified then aerial shooting may be an acceptable option. 2.) If problem wolves cannot be identified then the first step should be to issue shoot-on-site permits to the affected landowner(s). If the landowner shoots a wolf or wolves on his (her) property then this situation has the potential to create a situation whereby the rest of the pack learns to recognize the area as unsafe while at the same time enabling the landowner. This method is also less expensive then using WS to conduct control. 3.) If the landowner does not want the shoot-on-site permit but still wants wolf removal or if the shoot-on-site permit does not result in the taking of a wolf but depredations continue then WS should initiate trapping operations on the ranch or attempt to shoot wolves on the ground (example: shooting wolves that return to carcasses at night). 4.) If #2 and #3 fail then initiate aerial shooting operations. When depredations

occur on public lands I recommend the following approach to lethal control. 1.) If problem wolves can be identified then aerial shooting may be an acceptable option. 2.) If problem wolves cannot be identified then control should consist of trapping around the carcass or shooting wolves that return to the carcass at night. This assumes there is enough of a carcass remaining that it is likely that wolves would return. 3.) If #2 fails then initiate aerial shooting operations or issue shoot-on-site permits to livestock owners. 3. In section titled Livestock/Compensation it is stated (7th paragraph): “Considerations leading up to removal of wolves include persistent wolf activity evidence of wounded livestock the likelihood of additional losses if no action is taken evidence of unusual attractants and/or intentional feeding of wolves.” The way this is worded makes it sound like “evidence of unusual attractants and/or intentional feeding of wolves” could result in the removal of wolves. I do not think (hope) this is what was intended by the statement. This should be rewritten to clarify that “evidence of unusual attractants and/or intentional feeding of wolves” may result in decisions to NOT remove wolves. 4. I am very pleased and supportive of FWP’s proposing \$50 000 annually to be allocated to “efforts to reduce the risk of depredation and implement more proactive management strategies.” In the Livestock/Compensation section there was mention of WS potentially helping with these proactive efforts. I believe that this is INTEGRAL to a successful proactive management program and would recommend that FWP include this as part of their annual contract with WS to ensure their involvement.

E83: 1. FWP plan looks adequate and I have faith that FWP has the qualified individuals to make their plan functional and tweak it as necessary as dictated by the experiences and observations of time. 2. My concern is that stockgrowers or exotic animal hobbyists (llamas) may indiscriminately destroy wolves under this plan and get away with it ... all the while not contributing to the funding of FWP and the field officers they tie up. No matter that their compensation will not be from FWP funds... the cost is still obvious. It is my hope that such incidents will be vigorously investigated and some reasonable amount of proof demanded before accepting such killings. Just as important – if such persons defy or ignore the recommended precautions (as some now do) they should receive no compensation and be subject to fines.

E88: 1. Alternative 3 is the best alternative for Montana Gray Wolf Conservation and Management. Additional wolf pairs/packs are necessary prior to implementation of liberal management tools. 2. Greetings: During transition from Federal to State management of the gray wolf the following issues need to be addressed either by Memorandum of Understandings revised EIS subsequent administrative rule-making through FWP Commission etc.: 1) The statute MCA 87-3-130 requires formal definitions of threatening to kill or attacking or killing prior to State takeover. This pertains specifically to domestic dogs and the definitions of what is included in the term livestock. The creation of formal definitions will avoid the unnecessary killing of the gray wolf by homeowners and/or ranchers who have built their homes within the ecosystem/habitat of wildlife and feel that their rights and livestock should be protected. If homeowners/ranchers choose to live near National Forests or public lands then they choose to deal with the consequences of predator/prey dynamics. 2) Education - Education and outreach funding needs to be increased during the transition to State Management. 3) Monitoring - The wolves must be handled as little as possible. Collars and hands-on control must be decreased as numbers of packs/wolves stabilize. 4) Trapping - No wild animal should be trapped for sport game or predator control by the public. In fact no animal should be trapped including the inadvertent trapping of livestock recreational users of public lands and dogs. Trapping of wild animals by Federal or State agencies for preserving packs or wildlife should be implemented ethically by trained/qualified personnel under strict policy procedures and guidelines. The reintroduction of the Gray Wolf to YNP and Idaho has been a great success. It is imperative that tools are in place to maintain the minimum number of breeding pairs within each state or relist the Gray Wolf. There must never be an entire pack decimated (it was close to the entire pack) on public land (Boulder-Whitecloud) again. Thank you for the opportunity to comment.

Compensation

Summary of Comments: These comments address payments to livestock producers and others who experience wolf depredation losses – some comments strongly support FWP creating a compensation program while others strongly oppose it. Some comments express even stronger support for having increased access management tools under a state program compared to the existing federal program -- in lieu of creating a compensation program. A few comments suggest that compensation doesn’t buy tolerance and that it should be called “restitution” in the context of payment for “damages” to private property and for other indirect costs to livestock producers. Many comments mention the source and reliability of the funding and question how compensation would/should be administered. Some comments provide more detailed input on what should be covered, how a compensation program should work etc.

Response: The council discussed this issue at great length and in conjunction with wolf management strategies and wolf-livestock interactions. The Council believes, and FWP concurs, that there is a place for a compensation feature within the overall wolf conservation and management program. The Council and FWP acknowledge that tolerance for wolves on private property is fundamental to maintaining a viable wolf population in Montana. Furthermore, wolf restoration has resulted in the loss of personal property by wolf predation. A compensation program will help address that disparity, as well as provide a mechanism by which those who benefit from wolf restoration can help share the in the costs of long term conservation and management.

Under the preferred alternative, addressing wolf-livestock interactions will entail two separate, but parallel elements: 1. Activities by FWP, USDA WS, and individual producers to minimize the potential for wolf-livestock conflicts and to resolve conflicts where and when they occur and 2. a compensation program that would address economic losses of individual producers when livestock are confirmed or probably injured or killed by wolves. Management and compensation are funded, administered, and implemented separately and independently of one another, but are interrelated. They parallel one another, united in the goal of maintaining a viable wolf population and addressing economic losses. The reader is referred to pages 76-82 in the Draft EIS for greater detail on how these elements fit

together and how the program would be funded. FWP also believes that through proactive technical assistance and collaboration with livestock owners and the available conflict resolution tools, the financial obligations would be manageable.

FWP was recently involved in a cooperative effort to review existing compensation programs and research their effectiveness. Final results are expected late summer 2003. FWP will seek input from the public, the Wolf Advisory Council, and other interested parties when it begins to develop this program element. FWP will also explore the possibilities of partnerships with other organizations and other mechanisms of reimbursing those economic losses, such as insurance pools.

At this stage, FWP is committed to making sure that a compensation program or some other mechanism to address direct economic losses to livestock producers is developed. FWP acknowledges and thanks individuals who provided more specific input on how the program could be structured, funded, etc. FWP will revisit those comments when it begins working on the details.

Representative Comments:

W32: Uncomfortable with the cost. Especially with compensation. Why is wolf damage compensated and not other loss caused by other wildlife? Compensate for all forms of damage.

W81: Alternative #2. Compensation programs, livestock addressed twice. Kill permits PLUS compensation; seems like if they have the right to protect their livestock, we shouldn't pay them if they do a louse job.

W114: The compensation money needs to come from more than one source.

W122: Wolves should have equal right to take wildlife as any hunter. Strict evaluated poaching penalties. Fines should be higher than other species due to low numbers. Less compensation for livestock losses on public lands.

W123: Some percentage of the funding form compensation program should be from federal government.

W133: Who compensates for lions and bears?

W142: Alternative #2. Compensation – can't even find all the carcasses, much less document cause of death. Loose 10 cows and never find them – so never compensated.

W149: What about a sliding scale compensation related to landowners participation in predator prevention practices? But there is also liability in terms of guard dog loss etc. Would encourage creativity in more of a payoff.

W180: I like using compensation. I am leaning toward a blend of alternatives – I'd like #2 with compensation.

W193: Would drop compensation. People need to be responsibility for their pets and livestock. If a problem arises, I agree they should contact FWP and federal agencies and figure out how to address problems and manage their livestock the FWP manages wildlife.

W199: Prefer #3. I like the 20 breeding pair requirement. I think compensation for livestock loss should be the same as in Alternative #2.

W323: No way to control them on public or private land. Compensation too hard to prove actual losses. If I regularly lose 5%, then I lose 15%, anything over the normal should be compensated.

W325: Funding for compensation should come from the feds.

W327: Like to see protection or compensation when livestock are on allotments.

W368: Don't like State of Montana coming up with compensation. People who like wolves should pay.

W377: Compensation come from special permits.

W402: There are actual livestock losses well above (3-10x higher) – spent \$81,000 but Rock Creek lost more than \$30,000 last year. Need to lighten up standards on what we call confirmed kills. Compensation expenses for broken leg, vet fees, aborted calves, fences, cow dogs, added monitoring of livestock.

W407: Alternative 3 will fail without compensation. Too many wolves and no compensation. Doesn't make sense. Won't work here (Avon).

W414: How do you decide on compensation? What we do now isn't working. Defenders is not doing the compensation intended. Admirable effort, but need to loose requirements

APPENDIX 5

- W435: Doesn't make any difference which alternative. Does anyone know how much this is going to cost the state? Where will money come from? Does state know how many wolves are in Montana?> Alternatives without compensation not possible.
- W436: Proving that it is a wolf kill is hard! Should be easier to prove wolf kill.
- W443: Maybe compensation should be more than 100% cause can't prove every case. Private landowner should have more flexibility.
- W449: Federal government introduced wolves and they should pay compensation.
- W453: Not sure we'll get the sportsmen to pay for compensation.
- W461: Compensation should be based on what the animal is worth based on production potential.
- W462: Lean towards #4, but with compensation.
- W510: In order for alternative 3 to be viable, you must have a compensation program.
- W513: See if we could earmark funds from the bed tax for wolf/grizzly management and/or compensation.
- W519: Will never be able to develop a compensation program that fully compensates the landowner for livestock loss.
- W532: Some states such as Minnesota run out of compensation funds half way through the year.
- W579: Has a sunset date been considered for the compensation program? A compensation program should draw from the broadest possible base.
- W612: More in favor of compensation on private land than on public.
- W615: Compensation for wolf losses documented on private land should not be sunseted – keeps ranch, livestock on landscape.
- W677: compensation programs have to empower the landowner more.
- W680: Opposed to compensation program – it does not address the problem. It increases the problem. Use dollars to have Wildlife Services address depredation issues.
- W725: Landowners have flexible tools (compensation); some ranchers prefer additional flexibility vs. compensation program.
- W726: Don't make them have to have someone come out and look at kill to verify etc.
- W727: I like the idea of the compensation program.
- W785: Compensation – I don't like the work compensation; it should be more in the form of damages; someone should be responsible for damages to my private property.
- W804: If we don't like what is happening to our animals (livestock) on public ground, can move to private ground. Idea – if your allotment is in a high risk area, fed government should compensation (adjust) accordingly.
- W822: Compensation to the producer has never been addressed. If you have a registered case that has produced 2 prize willing bulls – she has the ability to produce 8 more calves, how are you going to pay for calves lost that are big money makers?
- W826: I like alternative #3 best with the addition that state would develop a compensation plan. But I think #2 is most reasonable because it balances the need of having wolves in Montana and the landowner and livestock owner's needs.
- W842: Compensation – where it is going to come from? How long will these funding sources continue?
- W856: I like the fact that there is a compensation provision in #2, but that it isn't coming from hunter \$\$.
- W857: How will you compensate hunters who don't get to take an elk because of lessening opportunity due to wolves?
- W859: What about the hounds man or rancher who loses dogs to wolves? Will there be compensation?
- W867: Compensation doesn't always pay for lost livestock. 1 of 8 paid is all. We're looking at an insurance program that would pay for lost stock.
- W918: Defenders fund, ranchers etc. set up insurance fund for paying for predator losses.
- W922: Compensation program needs to be user friendly; give ranchers the benefit of the doubt; streamline.
- W973: Can we depend on Defenders of Wildlife to continue their compensation program?
- W1049: Better to spend money managing wolves than on compensation.

APPENDIX 5

W1103: These wolves are just another nail in our coffin. Individuals that harbor wolves on private property should have to compensate landowners for losses caused by the wolves.

W1122: Trust sounds like a good approach. States get \$ from it. Put a bucket at each entrance of the part for wolf compensation trust.

W1194: No compensation for black bears and lions; should be the same for wolves. Work with landowners to have predator friendly livestock operations.

W1229: Compensation should be for ranchers, but also losses to sportsmen; should be considered and compensation for loss as it was sportsmen dollars that brought back the prey species.

W1332: Like alternative #3, but add in compensation like in alternative #2; Compensation should not just come from those who want wolves... should be like other government services – all tax payers pay.

W1351: FWP biased against alternative #4. FWP needs to develop range of reasonable alternatives. Alternative #4 ok but FWP is not giving it a fair presentation. Need compensation program for #4 and Department of Livestock needs to pay for it.

W1358: Compensation – business/group insurance to pay for livestock losses. Develop multi-state/group insurance. Ranchers pay just like other businesses. Let Department of Livestock kick in if they want.

W1404: Compensation to sportsmen of Montana to potential loss of hunting recreation and economic impact to state- private and federal funds.

W1423: Cut red tape on compensation – speed is important.

W1429: Compensation program – what are the options ranchers have for losses other than wolves? Should be some compensation, but not just for wolves.

W25: 1. We should have vibrant, viable long-term conservation for wolves, and I believe Alternative 3 provides the option. Wolves can generate a lot of tourism dollars and help balance our Montana wildlife. Wolves should be managed like any other wildlife we have in MT -- elk, bears, mtn. lions, etc. 2. Let wolves act naturally in their environment. Create funding from tourism revenue to compensate ranchers who receive livestock losses. Rather than using reactive control measures (I.e. shooting, trapping), use public outreach in pro-active ways to avoid lethal measures.

W27: 1. Alternative 2 & 3. Larger #s of breeding pairs (relative to all alternatives), allowances for adaptive mgmt, compensation (but see below), shift of mgmt away from USFWS to MT FWP, consideration of prey base, consideration of livestock owners, continued monitoring. *How would monitoring be done? Concern that each of the 3 states holds to their "10 b.p." minimum. I that no state perpetually operates below that minimum with the expectation that the other states will make up the difference. Also, that the agreement made by each of these 3 states' governors to accept this responsibility of a minimum of 10 bp will continue to be upheld, despite potential administration changes. 2. *Compensation issues -- 1) distinction between loss of livestock on private land v. public lands 2) potential for buying out grazing rights on land that is attractive to wolves instead of destroying every wolf that comes to that area. 3) Solicit funds for compensation from those with a vested interest in wolves (i.e. wolf supporters, cattle industry). *Increased outreach education with landowners/livestock owners to mitigate losses to wolves. *Management is science based and there is a continued partnership with FWP and universities to incr. our knowledge on wolf ecology. *# of breeding pairs should be less rigid and more flexible as more science on wolf ecology, carrying capacity becomes available. Concern that each of the 3 states holds to their "10 bop" minimum and that no state perpetually operates below that minimum with the expectation that the other sates will make up the difference. Also, that the agreement made by each of these states' governors to accept this responsibility of a minimum of 10 bops will continue to be upheld despite potential administration changes.

W77: 1) Alternative #2. This does not spend disproportionate amount of money on wolves, other species are of concern and need to be managed. It monitors a viable population and allows livestock protection. 2) If livestock owners are allowed to kill and haze to protect their animals why should they still get compensations? Why 15 pairs? Couldn't a reproductive value be more accurate?

W81: 1) I am with alternative #2 because I still have faith that FWP has particular insight on this issue, having been the recipient entity of all the concerned opinions of the Montanan's they serve. I like the possibility of being able to pressure them through seasonal hunts, and also since I am not the biological expert on the perfect number of breeding pairs we should allow. I like to lean toward the larger number to keep them off the list. 2) We should have a plan to share our bounty of predators with others across the USA as we should be generous and share with those who love them so much that they lobby from thousands of miles away to help the western states enjoy them exclusively, we are being unfair to keep them all to ourselves. On compensation once off the list compensation doesn't seem correct to me.

W87: Updated council, alternative #2. I would like to see local state control compensation program is important. Important to stay at 15 breeding pairs above the minimum requirement.

W107: Either alternative 2 or 4 because private land owners and livestock owners need to be able to protect property and livestock. We can't depend on the government to do it. The compensation plan is a joke. 2) I like most of plan 2 but the federal government should be responsible for compensation for livestock over historic death loss.

W115: 1) #2 gives flexibility to deal with problem packs. 2) Balance prey/predator /livestock. Emphasize funding needs. Get people who want wolves (not livestock or hunters!) to foot the bill. Relax the "proof of kill" before compensation is given. 90% of kills - especially in summer are never found. If 1% summer loss is my norm and now with wolves around, it is 5%. I should be compensated for 4%.

L0034: 1) Alternative 4. I feel it is necessary to minimize the livestock conflicts. The Federal implementation of the wolf introduction should require full responsibility for funding. 2) The Federal funding should also apply to livestock losses. There are logical situations that occur that have no compensation. This is not a just and fair practice and leaves the Montana food chain at an unjust and extreme disadvantage.

L0038: I concur with your preferred alternative. I personally would like to see wolves thrive in areas where that is possible and I think you have crafted an alternative which meets the needs of many different people who have often conflicting views on how wildlife in the State should be managed. I do have two specific comments on the draft. I think alternative 3 suffers somewhat by taking out the compensation program described in 2. I think a lot of people, like myself, who favor an aggressive wolf management will want to support alternative 3 but, without the compensation program set out in alternative 2, its feasibility becomes less practical. I think the discussion of economic consequences on page 109 is pretty weak. I understand that the information might be pretty hard to get at but perhaps you could improve the plan by providing an economic component to the monitoring program which will accompany the plan.

L0092: The Grey Wolf should not be de-listed. Their recovery is not sufficient. Delisting at this time would put the state legislatures on the starting blocks to completely eliminate wolves. The Defenders of Wildlife has and will continue to pay for losses to livestock due to wolves. The losses have been minimal. Extending and protecting road less wilderness makes a lot more sense than gutting the Endangered Species Act. Habitat is the key to survival of all the species including Homo sapiens.

L0176: My preference is plan #3, second choice plan #2. Compensation programs, however they are funded, should not become a permanent entitlement or worse, a way of buying off livestock producers and assuaging the conscience of "pro-wolf" advocates. It inappropriately sets wolves in a "special" category from other predators and other losses due to wildlife. It perpetuates the cartoon characterization of wolves by "excusing" their natural behavior with monetary compensation for the behavior. It bribes and demeans ranchers. The presence of wolves on the landscape reduces, like many other factors (weather, beef prices) the degree of control a rancher can exert over his livelihood. Incorporate compensation in the management plan ONLY under a sunset clause where it is understood that the compensation will either end on a set date OR continue only if the program is funded adequately through a bi-partisan sources (not JUST the wolf huggers). Any compensation program should seek to draw funds from the most diverse possible sources, including the meat and agriculture industry. If there is strict sunset provision (say 5 years and then compensation ends) it puts ranchers on notice that they have a reasonable time to make adjustments to the new reality of wolves on the landscape and it financially bridges that adjustment time. The compensation fund should also financially support education and innovation in regards to new approaches to managing livestock in an environment that includes wolves. Incentives for those ranchers willing to struggle with the adjustments necessary should be more important than paying off ranchers for affects of predation. Compensation should only apply to predation losses suffered on private property. This sends an appropriate message of support for the sanctity of private property and at the same time, signals that those who use public land accept certain caveats along with that usage. Only hunting, not trapping, should be allowed as a proactive management tool for culling wolves. Trapping is not only very difficult to defend in terms of the perceived brutality but it does little to condition wolves in ways that benefit wolves and humans. Wolf hunts should be conducted under strict regulations based on best science and in such a way as to do the least damage to pack social structure. Wolf hunts should only be guided commercial hunts, conducted with an outfitter who has been trained and certified by FWP. FWP would designate those animals available within pack structure who may be taken and outfitters would be certified and trained to select those animals for their hunter clients.

L0186: Any wolf on private property or livestock allotment can be killed by livestock owner or anyone he or she authorizes. They can be listed or game animals on public property with no special license fee or no limited season. Their only safe haven in state and national parks. As for compensation for livestock losses, actual or suspected. The general public, who allowed their reintroduction will assume full responsibility for reimbursement at full market value. Also the cost of administrating the program will be in the hands of those wildlife and environmental organizations that pushed reintroduction.

L0207: 1)Alt. #2 because of compensation program. Without the compensation program it would be alt. #4. 2)Wolves are not needed in Montana.

L0209: 1)The feds did not give us any choices. Now we have 5 alternatives. What alternative will we have when the prey animals are eliminated? Regardless of the alternative selected the feds will still have the final say. So alternative 4 is my selection. Let the feds pay for what they want. 2)Funding will become a problem as the packs increase. Also insist on federal compensation for depletion of game animals and livestock losses.

L0212: 1)#3 Maximum wolf. The ecosystem evolved with wolves and important part, weeding out the weak and the sick prey and stabilizing deer and elk populations and the result being genetically superior population of prey species. While wolves can become predators on domestic livestock, this problem should be dealt with by weeding out problem animals. 2)Stock predation on private land should be compensated for, by the government if private compensation is not available. Stock losses on public land would be considered part of the cost of doing business and some allowance for such losses should be recognized in determining grazing permit fees.

L0217: 1)Alternative #2 is a step in the right direction. 2)Compensation for losses to livestock must not only cover death losses but also the loss of weaning weights and the lower pregnancy rates created by the wolfs presence. Due to our range land remoteness, confirmed kill compensation is not totally feasible. We must compensate for probable loss also.

L0259: 1)Nor shall private property be taken for public use without compensation. Amendment 5. 2)Let the wolf lovers start buying hay-feed to replace the land or grazing the rancher can not use. I intend to go by the constitution of the USA. Combat vet. WW2. I don't scare, pay me \$20,000 for 2002.

L0284: Alternative number two is the better proposal offered. The MWGA does not approve of the term "compensation". If the public wants wolves, the public should pay for full damages caused by wolves. MGWA makes a point that it is not just the loss of the animal that is costly to a rancher, but other costs such as time attempts to keep prey and livestock apart, stress that is real on the other animals not actually killed by the wolf in its' attack on animals. Alternative #2 while this option seems to be the one that may work we don't think some of the things that wolves do is addressed. We are concerned as to how they will be counted toward the 15 pack management preference when it comes to more aggressive management plans should the number of packs drop below fifteen. MWGA does not believe the plan speaks to smaller number of wolves, which might not meet the definition of a "pack". The term "social group" is used, and maybe that definition is not clear. MWGA is not in favor of the Montana Fish and Wildlife dept. being the "controlling agent". MFWP lacks the expertise and we think the willingness to deal with predatory animals causing livestock losses. MWGA believes the federal Wildlife Services under USDA/APHIS is the only appropriate agency to deal with wolf control. Funding for wolf control must come from appropriations of the federal government under Interior and USDA. Quick responses to wolf predation. Let USDA/Wildlife Services do the field work. Any wolf management proposal must clearly state a procedure for the livestock owner, get a quick remedy. The plan can't have a mixed bag of people

notified and making decisions. We don't see in the plan any addressing of the consequences of having wolves on your property when it comes to other predation of having wolves on your property when it comes to other predation management. Are using the wolf to end coyote control. Alternative four looks good on the surface, but with the state having to pick up the funding for control and for payment of damages, that is not an alternative. Alternative #5 must also be considered seeing the already threats by environmental non-hunting groups to stop any delisting of the wolf.

L0314: I am in support of the wolf reintroduction program as well as wolf management in the state of Montana. I would like to see this handled scientifically and not ruled by emotions. It is our job to do the best that we can with keeping the wolf as one of our state treasures. I also think that an advisory board needs to be set-up of ranchers, hunters, citizens, government agencies, animal environmentalists and etc. to advice. If cows, dogs and farm animals can be compensated then I believe that our state treasures, deer, elk, moose, wolves, cougar and etc. can also have a high rate applied to them and when they are poached then that rate along with any other fines would be given to the poacher to pay. This flat rate would then be put back into FWP funds for protecting our out of doors as well as compensation for when a farm animal is taken by a wolf. Rule this rationally, legally and scientifically. Let us all benefit by keeping wolves in our state and set an example for other states to follow. Keep wolves in Montana.

L0343: 1) Contingency - alternative #5 has best options for me. Permanent approach. Remain on federal list until more stable and larger population. Shared management under a cooperative agreement. Breeding pairs benchmark increased to 30. Cost shared perhaps 50/50 between FWP and USFWS. 2) Federal livestock rules until FWP has a stable proven management program. Do not feel comfortable with any wolf harvest ever. Livestock compensation - a shared responsibility - government and non-profit wildlife organizations.

L0345: 1) The Russell County Sportsmen's Association would like to be on the record as supporting alternative #2. 2) The Russell County Sportsmen's Association would strongly urge and request that a program of compensation for the public loss of a public resource, wildlife be developed to match the compensation program for private livestock losses. This could be increased access, improved habitat and more FWP law enforcement and field biologist staff.

L0004: 1) #4. This has the least amount of breeding pairs and the brain dead bureaucrats who shoved this down our throats will have to pay for it - not Montana residents. 2) Give FWP full flexibility - not limited for local concerns. The brain deads should fund a full compensation program for ranchers and all others concerned - we didn't ask for this BS.

L0014: 1) Contingency - alternative #5. Federal government rules of management and protection have resulted in viable populations of wolves in Montana. Prey (elk) management should be balanced with predator control. Montana should handle compensation to ranchers with a coalition of other concerned entities, i.e. Defenders of Wildlife.

L0058: 1) Alternative 2 gives FWP the more flexible manageable tools to manage wolves in the future. 2) Sports and landowner and property owners would have a say in the development of compensation. Federal agencies to pay their share in the future.

L0062: 1) #5 we need to move into the wolf plan with all bases covered and all problems addressed. Education and caution. #2 could also work. 2) I would drop the compensation, people need to be responsible for their pets and livestock, contact FWP or USFWS and come up with a plan together so they are able to manage their livestock as FWP and USFWS manage wolves etc.

L0080: 1) Alternative 1 because the breeding pair benchmark set in the other alternatives is arbitrary and capricious. Given the size of MT and amount of potential habitat, 15 packs is too few. There is no scientific justification for this number. 2) Develop compensation program. Assure funding.

L0100: 1) Alternative #2 leaning towards Alternative #3. Because of the 20 pack would allow landowners/ranchers more flexibility in dealing with wolves versus compensation, which doesn't seem like a sustainable solution. I also like the possibilities of hunting, any way the public becomes more part of the process, the more successful the wolf program will be.

L0111: 1) Alternative 2 - The 15 breeding pair benchmark is sufficient - 10 is too little, 20 is too many. I also appreciate the ability of the landowner to respond to conflicts. It is essential for the wolf to be delisted as soon as possible. 2) I feel once the wolves are delisted which provides for landowners to protect and defend private land there should not be a compensation program. Any type of a board or committee that would oversee losses and determine the "worth" of that loss creates a no-win situation. It will be difficult enough for FWP to financially manage the wolves without the added burden of raising money for compensation of losses.

L0120: 1) #4. I think federal compensation should be available for livestock. 2) Ten breeding pairs is more than enough wolves. Federal government should bear all cost of wolf management program.

L0141: 1) Alternative 2. It has the moderate approach that can be delisted and work. The wolf must be delisted. The livestock industry needs a compensation program that reflects the actual losses of the producer. Wildlife services must address depredation in a timely manner 24 hours or less. I very much like how the compensation questions were answered on the question and answer sheet. 2) I would like to see the definition of a pack made more liberal i.e. 4 animals in a family unit be a pack. We need full federal funding. Trapping needs to be allowed.

E5: 1. I would like to see Alternative # 3 adopted it combines the best of alternative 2&3 and increases the number of breeding pairs. I am concerned about compensation to stockgrowers as the plan does not make much effort in that area. I do not like Alt.# 4 because it seems to let stockgrowers shoot at will which I disagree with. All the plans have been well thought out and I commend FWP for your effort. 2. I would like to see State Federal and private groups combine efforts to compensate stockgrowers because I think they will not be as likely to shoot wolves thereby increasing the chances of there survival. Thanks for letting me participate.

E9: 1. I have not read the alternatives yet I will. My choice to manage the wolf would be any alternative that considers the wolf a predator outside of Wilderness and Park areas (open hunting/trapping) and regulated hunting is allowed within these areas to manage population. 2. Hound hunters are having their dogs slaughtered by wolves. The barking of a trailing dog is attracting the wolves. Stories of hunters finding their dogs brutally ripped to pieces are very common and on the increase. This is a regular event not an isolated few occurrences. Talk to the hunters especially in Idaho and Western Montana. I for one found more wolf tracks in Southwest Montana than I did lion tracks and not in the heart of the wolf recovery areas either.

These things are everywhere. It is only fair that the hound hunter be able to protect his hounds from wolves by any means necessary. If it is proposed that a rancher can protect a \$400 calf or his \$300 ranch dog then it is only right that a hound hunter be able to protect his hounds. A working hound dog has a value of \$1 000 to \$5 000 or more. Typically hunters will run 2 to 5 dogs. Wolves that kill an entire hound pack which is happening can conceivably destroy up to \$20 000-\$25 000 worth of dogs. Where our right to protect our more valuable property? Nobody is reimbursing us. Hound hunters as myself should not only have the right to protect our property we demand that right!

E18: 1. Minimum Wolf...Option number 4. (please read comments below) With human population constantly expanding and habitat diminishing all wildlife needs to be managed. Don't worry about the \$800K it will take in politics to de-list the wolf for state management the wolves will kill more than that each year in wildlife and domestic species. Please do not try to sell the money argument. The thing that is wrong with minimal management and studies are this: Someone has to experience a LOSS before you can act. Since you and the Fed re-introduced the wolves YOU are libel for the damage they cause. Therefore you should financially compensate anyone who loses livestock to wolves. Also if a bighorn ram tag at auction goes for \$100 000 each year...and the wolves kill 10 rams a year (which is conservative) then you are losing 1 million dollars in wildlife just in sheep. Let hunters manage the wolves the same way they manage Black Bears and cougars. Further more the Grizzly should be de-listed as well and a handful of tags should be made available for Griz as well. In the year 2003...animal species need to be able to finance their own existence. They need to have value a financial asset not a liability! When the public finds out what a huge tax burden wolves are becoming you will over time reduce the value of these great animals and restore their turn of the century reputation of useless vermin.

E43: 1. Nothing. 2. Make sure that livestock owners are actually compensated without having to dam-near come up with video of the wolf killing livestock.

E61: 1. Alternative 2 gives landowners means to control (within reason) the safety of his livelihood and be compensated for losses. 2. Would riders and ranch employees who are responsible for livestock have the right to use kill permits as well as landowners since they would be likely to observe conflicts? I think that when livestock is killed injured or threatened the entire pack should be eliminated to prevent additional losses expense and time.

E93: 1. Alternative 2 Basically the reason I picked this alternative is because it gives F.W.P. the most flexibility and I believe they will need this with such an adaptable animal to try and manage. 2. Allow hunters to be the tool for controlling wolves as predation on deer and elk will mostly affect them. Try to keep most of our breeding pairs and packs in and around the Yellowstone and Glacier Park where hunting is not allowed and tourists can see the real effect of wolves on our environment after all it was they who wanted to see the wolf in it's natural environment. Fully funded by the Fed's defenders of wildlife should continue to fund with the Fed's as long as there's protection of any kind other than quota seasons for the wolf they should not be allowed to bow out of their share of responsibility. Defenders of Wildlife and other non-sporting entities such as photographers and those that would benefit from viewing the wolf should be allowed to provide funding such as sportsmen and women do thru licensing and permits to help cover added expense of managing wolves.

Economics / Livelihoods

Summary of Comments: These comments address the economic costs and benefits of having wolves in Montana, livelihoods, ecotourism, and fiscal impacts to FWP. Some comments express concern about the livelihoods of those individuals who may be negatively affected by wolves. Some comments speculate that wolf presence will hurt either Montana's statewide economy or local economies based on impacts to the livestock industry because of wolf depredation. Closely related comments predict negative economic impacts to local economies due to declines in expenditures for big game hunting because of declines in prey populations. Other comments tout the economic contribution that wolf restoration makes to Montana's statewide and local regional economies through tourism. Closely related comments suggest impacts to individual's livelihoods if the wolf management program is too aggressive. Some comments question the adequacy and completeness of the economic analysis. A few comments mention a concern that land management activities could be negatively affected by the presence of wolves.

Comments related to a compensation program for livestock losses are addressed under Compensation. Comments discussing costs to the State of Montana or FWP to implement the program are addressed in under Funding.

Response: Lacking the knowledge and expertise to address this issue in-house, FWP contracted with Bioeconomics Inc. to prepare this section of the Draft EIS. Bioeconomics Inc. is a private company specializing in the field of natural resource economics. Bioeconomics and FWP found that there are a great many theories and widespread speculation about the economic costs and benefits of wolf restoration, but few data exist pertaining to a state management program for a recovered population. For example, much of the economic analysis and information on the costs and benefits of wolf restoration pertains to the actual reintroduction effort in Yellowstone and central Idaho – not necessarily a long-term management program of a recovered, and hence, delisted species in Montana or elsewhere. Data simply are not available to address some aspects of this issue that FWP and Bioeconomics would have liked to address. Therefore, the economic analysis relied on the available data and published literature.

Bioeconomics and FWP limited the scope of the economic analysis to that for which FWP has legal jurisdiction and/or responsibility and to the issue areas and the outcomes which FWP would have some ability to influence, given differences in how the management program was implemented. Furthermore, the economic analysis provides a relative comparison

between the alternatives using estimates, rather than absolute values of economic costs and benefits. Again, this was due, in part, to the lack of relevant data.

In the preferred alternative, FWP and the Montana Wolf Management Advisory Council acknowledge that the economic costs and benefits of wolf restoration in Montana accrue to individuals or economic sectors differently. Some individuals or economic sectors may benefit while others may be harmed. Furthermore, benefits and costs seem to affect individuals more significantly, rather than an industry as a whole. Therefore, this disparity is addressed through the inclusion of certain management tools or strategies. FWP and the council also acknowledged that some economic sectors benefit from the increased tourism and visitation associated with wolf-viewing and tourists' perception of Montana as a wild and scenic place to visit. These benefits are acknowledged through the recognition in the preferred alternative that the gray wolf is a native species and that it will be integrated as a valuable part of Montana's wildlife heritage. However, some economic sectors may be negatively affected. Livestock producers and outfitters have expressed concern about that potential. Livestock producers may experience increased costs or direct losses due to wolves. FWP's preferred alternative includes tools to help mitigate for that. FWP doesn't have responsibility for the Board or Outfitters or land management agencies with regard to the outfitting industry. However, FWP does have authority for the variable priced licensing system for non-residents and for managing ungulate populations and hunter opportunity for both residents and non-residents. The preferred alternative seeks to integrate the management of large carnivore and ungulate populations while maintaining traditional hunting opportunities. Thus overall, awareness and sensitivity to concerns about economics/livelihoods are addressed in the preferred alternative by the management direction to integrate and sustain a wolf population within the complex biological, social, economic, and political landscape.

During the wolf recovery phase, USFWS indicated that restrictions on federal land management activities (e.g. logging or grazing) were not necessary for wolf recovery or long-term management. FWP agrees.

Representative Comments:

W51: Do not change the way we live to accommodate the wolf. If they survive great, but do not accommodate them at our expense.

W103: Economic values are different among people.

W260: Livestock producers ultimately pay for wolves.

W1068: Gardiner late hunt is economically important to Gardiner -- economically we are being hurt.

W1071: People who come to watch wolves spend a lot of money.

W1388: Alternatives are political – wolves will impact communities economically.

W1412: Need not just evaluate wolves. We need to evaluate the impacts of wolves on ranchers/farmers and sportsmen. That is more important to Montana and local economies. Find out why property is being sold and why they are going out of business.

W1343: Gardiner has tourists in the early spring now because of wolves – didn't before. Auction of wolf permit like moose or sheep.

W1405: Hunting success has gone down – effects especially non-residents. It will be a huge economic impact to Montana.

W1044: I am concerned about no hunters as a result of low elk.

W1104: I am a B&B owner and there needs to be enough wolves to support our livelihood.

W1107: How will wolf management reflect impacts to outfitters? We used to take out 30-35 hunters – this year we only booked 17 and reduced our prices.

W1120: Regarding compensation – what about an outfitter who loses business due to lack of wildlife?

W601: I am concerned that wolves will cause problems with infrastructure of state – loss of livestock producers and open space.

L0173: Wolves are an important part of a healthy ecosystem. Wolves are important to the economies of the Montana area. Wolves have received a "bum rap". They are not the huge predation problem they have been made out to be. Adopt a no-wolf-killing plan.

L0179: Add my support to the MSSA position. It is the most appropriate position for the state to take on wolf management. Wolves are going to decimate the elk and deer populations which will cause dire consequences in the states revenue through lost hunting license fees. Plus the large amount spent in the state by the local and out of state hunters themselves. Then there will be continued advancing livestock losses. Which will devastate another huge Montana industry. Plus the in and out of state hikers that will be afraid to venture into the mountains, more dollars lost. Montana and its citizens must come first.

L0190: Any wolf plan to introduce wolves into eastern Montana would be extremely detrimental to stock growers and landowners. Hunting is also a large factor in the local economy. The business that rely on the thousands of hunters that visit our area each hunting season would be severely affected by introducing wolves. Landowners that withdraw their acreages from the block management program and landowners that close private lands to hunting would greatly affect the economy of the central Montana area. We strongly urge no consideration be given to introducing the Montana gray wolf in eastern Montana.

L0191: I remain concerned that alternative 2 is unnecessarily liberal and encourage reconsideration of alt. 4. With a three state recovery area Montana's contribution to the recovery effort need no exceed 10 breeding pairs or 1/3 of the area goal. Adverse economic impacts would be minimized with lower sustained wolf population. Opposition from cattle producers would be minimized along with potential contention that may result between ranchers and sportsmen (landowner's proposal to withdraw from block management in "protest"). Somewhat deficient in its assessment of potentially adverse impacts to elk populations. 200 wolves consuming 7(?) elk apiece represents an economic impact that is not quantified in the EIS. Using a value of poaching violations, \$1000 per elk, predation poses a potential economic loss of \$1.4 million annually, lost hunter opportunities and revenues. Given Montana's rich and economically important hunting heritage, any serious threat such as a significant increase in predators deserves exacting quantification.

L0215: I strongly support Fergus County Commissioners resolution 6-2003, which opposes the establishment of wolves in Fergus County. Alternative #2 with exceptions that you: establish a zone for the wolf population and give landowners more flexibility in the central and eastern zones. I support actively managing wolves west of the line drawn on the map by Fergus county commissioners. Please add the wording in alternative #4 pg. 91, to alternative #2. Wolf distribution would be strongly discouraged in central and eastern Montana. They could be routinely trapped and relocated to western Montana, or removed from the population if no suitable release sites could be found. Agriculture is our top source of revenue in eastern Montana, along with revenue from hunting.

L0274: We do not want wolves established in Wheatland County. We feel that we need to protect Wheatland County's #1 resource: agriculture. Wheatland County's resolution #64 expresses our desire to prohibit the presence, introduction, or reintroduction of wolves within the boundaries of Wheatland County. It appears that Alternative #2 is best suited for Wheatland County. We believe that a zone needs to be established for the wolf population, and that landowners in the Central and Eastern Zones need to be given more flexibility.

L0302: Alternative #2 with some changes would be the best option. 12 Breeding pairs. Stop wolves from moving into new areas (central and eastern Montana). As an outfitter, farmer, rancher in N central Montana in the Missouri Breaks, I am of the opinion that wolves would hurt me severely financially. It is very important for me that wolves be held where they are now.

L0313: Every wolf pack that has come in contact with domestic livestock has eventually had conflicts resulting in direct or indirect losses to those livestock. Since the perpetuation of Montana's wildlife depends on the habitats of Montanans private lands we feel the following criteria must be incorporated into the wolf management plan for Montana. Wolf numbers must be the absolute minimum to satisfy relisting the wolf. Recognize the wolf is a predator and livestock producers must have the right to protect their livestock on private and public ranges, using preventive and reactive methods. Damage caused by wolves must cover confirmed and probable kills and also all indirect losses from wolf conflicts. Compensation is not acceptable and should not release those responsible for the accountability of reintroducing the wolf and the damages caused by their actions. Management of the wolves should be directed to maintaining the minimum number of packs to prevent re-listing and also establish a maximum number of packs Montana has to tolerate and provide wildlife and livestock as its prey base.

L0050: 1) Alternative #3 more wolves promote healthier big game populations. They also create a more diverse scavenger community. More wolves generate tourism dollars unlike livestock industry which is dependent on government subsidies for its survival. More wolves fill a vital ecological niche that was destroyed because of cow ranching. 2) Manage wolves like other wildlife such as elk, bear and mountain lion. Provisions for killing of wolves by citizens should be clear and specific. Funding must be assured before the plan is finalized. Key areas of wolf habitat should be protected during the opening season, large areas must be maintained for both wolves and their natural prey free from disturbance by people.

L037: USFWS has spent millions to establish these wolves in Montana, and now that the wolf population is multiplying rapidly, they want to dump this mess on Montana. FWP proposes to accept this responsibility and this should be refused for the following reasons: 1) Money. Montana does not have \$800,000.00 a year to spend on wolf management, and it certainly won't have the ever-increasing money needed as these wolves increase. Managing these wolves is not a Montana responsibility - it's a Federal responsibility. Until Congress passes laws providing money to fully fund that responsibility, all further planning is a waste of time. 2. Publicity. USFWS apparently killed at least a half dozen cattle-killing wolves in the last 12 months in Montana. Every year far into the future, more wolves have to be killed every year because they're attacking livestock. Our State spends a fortune every year trying to encourage tourism. What is the possible logic of allowing those advertisements to be offset by TV pictures of Montana officials "murdering" the wolves? 3) Wolves will decimate our big game. Big game hunting is Montana is a major economic and pleasure activity, both for locals and for out-of-staters. These ever increasing packs of wolves are going to decimate our deer, elk and moose, and our hunting economy will evaporate. 4 Let the USFWS keep the wolf problem. USFWS wants to give Montana control, but USFWS expects to continue to tell Montana how many breeding pairs we must maintain; when and under what circumstances Montana can allow a wolf to be shot, etc. If Montana takes over wolf management under any USFWS approved plan, USFWS will continue as the great father, disciplining Montana if any facet of our wolf management doesn't meet great father's requirements. Wolves so far the a USFWS problem and the wolves are rapidly multiplying and the problem is rapidly getting worse. Why should the State of Montana assume this problem? Why shouldn't this continue to be a USFWS problem and why shouldn't Montana make every effort to require USFWS to protect Montana's citizens from the depredations and losses these wolves are going to cause us as these wolves rapidly proliferate?

L0124: #3 is best. Wildlife are essential element of our culture. By maximizing wolf numbers, larger areas of habitat for all species will potentially be preserved. Livestock producers are a tiny part of the Montana economy and need to adapt to changing conditions in the same way that other businesses do. They do not need special treatment as long as they are able to defend stock on private land. 2) Remove the MT Dept. of Livestock from any role in wolf management. Managing predators to increase prey does not work, except in very localized areas, and should not be practiced generally. Public lands is virtually the only habitat left for wildlife. Livestock should be excluded for public land or at least not be protected from wolf depredation with lethal means on private land.

E15: 1. Our family has been using livestock as a tool to manage the health of the range resources we control in southwestern Montana and southeastern Idaho since the 1880's. Agrarian societies and wolves have never been compatible. This is why wolves were removed from agrarian communities in the United States and in the rest of the world. Wolves were pushed back into areas that were not utilized by livestock. The Endangered Species Act was used by extreme preservationists to bring the wolf back and cause land use changes. Much of the private land in the western United States is used for livestock production. When the wolf forces livestock off these lands this land will be sold to wealthy recreation interests and the wildlife habitat will be fragmented beyond recognition and the openness of the West that draws people will be lost. Most of the public lands are intermingled with private lands that contain the most productive and valuable habitat. My comments on the preferred alternative are being made recognizing the above realities and the past inability of the Montana Fish Wildlife and Parks (MFW&P) to control wildlife numbers and failure to recognize and adequately compensate landowners for their contributions to wildlife habitat and the coffers of this state. These comments are being made on the Preferred Alternative as presented in the Executive Summary. Wolf Management The wolf will fall under the same category as the black bear and mountain lion yet presents a much greater problem than these two species to the game herds and the livestock industry. All a wolf needs to survive is something to eat. The wolf will be much more difficult to control. To suggest that they can be managed the same is unrealistic. The wolf should be put in a separate category that recognizes that he is nature's primary killing machine and design tools that can address and compensate for his impact. The MFW&P is going to ask for compensation for an illegal harvest of a wolf but refuses to pay for livestock taken by a wolf or ask for compensation for wolf takings of other wildlife. This needs to be addressed. Number of Wolves in 2015 How can we depend upon these numbers? I well remember the numbers proposed for the MFW&P elk plans. The plan needs a mechanism that will make MFW&P liable to the hunter and the livestock industry if these numbers are not held to. Distribution in 2015 All distribution will be localized and as the prey base of wild ungulates decreases wolf will be forced to target livestock and pets on private lands and in more populated areas. If statewide distribution is being considered this plan is much bigger than being portrayed. We need specific population areas and numbers otherwise we will have more numbers than needed to satisfy the USFW and the MFW&P have a dismal record in managing numbers especially elk. Wolf Habitat Connectivity Land Management When the wolf was first being introduced the USFW Service met with the ranchers and assured them that the wolf had limited habitat requirements. This heading supports the preservationists' goal in using the wolf as a takings weapon: "Connectivity assured through legal protection". It looks like the MFW&P is going to use the wolf to manage land. This is outside their legal authority but is increasingly becoming their intention. This section of the plan should be dropped because the nature of the wolf makes it unnecessary. Private Property the implications of having wolves versus other publicly-owned wildlife on private land is not comparable. One must understand that the wolf is the ultimate predator whether classified as such or not. Once the wolf is delisted it becomes the responsibility of the State of Montana and managed by the MFW&P. Forcing the private landowner to accommodate a wolf limits his ability to use his property as he wishes. This is a takings and since the wolf is delisted and Montana is responsible Montana will incur tremendous liability. This liability must not be accepted by Montana in this plan and the federal government and/or the successful petitioners must be held responsible. This issue could break the state of Montana. Compensation As discussed under private property when the wolf is delisted it becomes the responsibility of the State of Montana. Originally the wolf was eliminated from Montana because it was not compatible with the other land users. This was a cooperative program with the state. The wolf is the supreme predator and cannot be compared or treated like other predators or game animals. As wildlife numbers decrease or move onto private land for security the wolf will follow and the numbers of livestock losses could explode. It is imperative that the state of Montana and/or the federal government be held responsible for the total costs of livestock losses. This will assure that Montana and the federal government will responsibly manage this negative impact of wolf reintroduction. The rancher already supplies a big share of habitat and feed for the state's wildlife are we also obligated to supply the meat to support the wolf? All livestock losses from wolves exceeding that predicted in 2015 under the preferred alternative in table 3 should be paid by the state or federal government. Economics Livelihoods This section is poorly addressed. The potential economic impact to livestock operations and the resulting change in land ownership patterns is immense. No attempt to understand the current financial stress of the public land livestock industry is apparent in this plan. No guarantees are made as to the efficacy of the plan to control wolf depredation. The private landowner is left to fend for himself with few tools. No consideration has been given to the impact to Montana and wildlife habitat as ownership patterns change due to the loss of a viable livestock industry. This wolf management plan could directly contribute to these potential changes. Takings of private property private property rights and livelihoods is generally being ignored. This section needs to be expanded. MEPA NEPA REQUIREMENTS All the ramifications that this Wolf Conservation and Management Plan will have on the livestock industry landownership patterns county economies the support of the county infrastructure other wildlife and hunting opportunities and subsequent revenues have not been addressed to the extent required by MEPA and NEPA. What is especially of concern is the unwillingness of the MFW&P to accept responsibilities of the management of the wildlife under their direction and mitigation for the damages and impact cause by this wildlife. The politics of the Endangered have the potential to destroy all that we have worked for in Montana. It is important in this plan to force those responsible for this dilemma to mitigate the consequences. This is the only way we are going to stop this madness that will ultimately end up with single use of the resource by those who refuse to accept the responsibility of ownership. 2. see above.

E82: 1. One of Montana's largest dollar based business is hunting. I am in favor of alternative No. 4. If there was a choice for going back to the way it was prior to the introduction of wolves that would be my choice. Montana needs to take control of it's own destiny and protect the hunting heritage that we have today before it is too late. There has already been a reduction in hunter opportunity in the hunting districts around the park and it won't be long before it effects other parts of the state. 2. Delist the wolves and let the state of Montana regulate them with no help from the fed's.

E92: 1. The best choice and the one which I ask FWP to adopt is Alternative 3. The reason is that it insures the highest number of breeding pairs of all the 5 alternatives being considered by FWP. Alternative 3 best represents the chance for Montana to have a healthy and viable population of wolves. I believe it is critical that the State of Montana have the largest number of wolves feasible for the following reasons: 1. Wolves promote healthy big game populations and cull the weakest from among the ungulate herds. This fosters better big-game populations. 2. A higher wolf population means an increase in tourism and this promotes the State's economy. There is ample evidence that this will occur by virtue of the experience seen in Yellowstone National Park. 3. According to the 2002 Montana Agricultural Statistic Service report wolves are responsible for less than 1% of all livestock losses in the state. For the past 7 years over twice as many sheep have been lost to turtling (which as I understand it means rolling over in the rain and not being able to get up than have been lost to wolves. Wolf predation on livestock represents less than one-thousandth of one percent of the total number of head in Montana. 4. Increased wolf populations promote a better balance in the carnivore community as evidenced in Yellowstone Park. In Yellowstone the presence of wolves has resulted in a more diverse predator and scavenger community. 2. Alternative 3 could be improved by increasing the number of breeding pairs upwards from the 20 in Alternative 3 to 25 pairs.

Habitat / Land Management / Connectivity

Summary of Comments: These comments address the need for wolves to move freely through Montana, within the tri-state area, and across the international border and question how and where this will be accomplished. Some comments also address whether or not there is a need (or support) for motorized travel restrictions or localized area closures where wolf packs establish den or rendezvous sites – some indicating yes and others indicating no.

Response: Ungulate distribution and human settlement patterns largely define wolf habitat. FWP has limited jurisdiction over habitats on lands for which it does not have a contractual interest or fee title. Nonetheless, FWP, charged with perpetuating viable wildlife populations, has a keen interest in habitat issues. FWP works with federal, state, private and corporate land managers on issues of mutual interest for the benefit of all wildlife species. FWP and private non-governmental organizations have been active in working with land managers on behalf of wildlife habitat and specifically on elk security. Indeed, these efforts have influenced land management in some cases and positive benefits for wildlife have been realized. In addition, FWP works cooperatively with interested private landowners and livestock producers to improve vegetation or other habitat features for wildlife and at times, working collaboratively to mitigate wildlife use of those lands.

FWP ungulate programs link habitat and population management through hunting and by collaborating with private landowners and habitat managers of other agencies. In this way, FWP takes an important habitat need of wolves into consideration. In its downlisting proposal, USFWS (2000) concluded that there were no foreseeable habitat related threats or reasons to suspect a significant decline in ungulate populations that could jeopardize a recovered wolf population. FWP agrees with this assessment, but will remain an advocate for wildlife habitat.

The preferred alternative did not recommend designating specific habitat corridors, travel restrictions, or area closures. USFWS determined that they were not necessary to restore the gray wolf in Montana and the northern Rockies and they should not be necessary to conserve and manage a recovered population, so long as other mechanisms adequately regulate human caused wolf mortality. Because the gray wolf is a highly mobile, habitat generalist, specific habitat designations would be impractical. FWP does acknowledge that specific areas closures may be warranted under certain conditions and will explore those management options collaboratively with the land managing authority. The reader is referred to Appendix 1 of the Draft EIS (pages 25-27) for additional supporting scientific literature.

Representative Comments:

W628: would like to see management based on viable habitat rather than #s, protection of habitat; identify core areas and manage for them.

W1187: Habitat connectivity is essential, nothing in the plan addresses the future relative to habitat issues, such as more “designated wilderness.”

W633: Habitat for wildlife, not just wolves is a key component

W744: Improvements – 1. 20 breeding pairs is a better number. 2. Need to have basic habitat protections i.e. denning areas at critical times of the year will get more protection. 3. Need indications that wolves pose immediate threat. No random shooting of wolves.

L0230: Their presence in MT contributes greatly to our states "wildness" image which is a lure for many tourists. Wolves also play an important part in an ecosystem. Other endangered predators are benefited. We do not feel there is a need for setting artificial limits on population or location of wolves. It would be a tragedy for all that's been achieved to be lost if the future management plan proved too stringent and restrictive on their populations. Their recovery is still tenuous, too many human caused mortalities or disease could put their recovery in jeopardy that is why we are convinced of the necessity of implementing alternative 3 which calls for the benchmark of 20 breeding pairs. Wolves are still a species in need of management, alternative 3 provides the protection they still must have. Killing of wolves should be precise and unequivocally spelled out so there are no gray areas, permitted only if it poses an immediate threat to people, pets or livestock. Key areas of wolf habitat secured from inordinate human disturbance during denning season. Long term wolf conservation must be the goal of this new plan. Before it is finalized funding for state wolf management must be assured.

L0319: The department agrees that the long-term future of wolves in Montana depends upon carefully balancing the biological, social, economic and political complexities of wolf management. Further, it is also DNRC's view that it is appropriate for FWP to develop a comprehensive management program. The FWP preferred alternative appears unlikely to create appreciable conflicts with our legal mandate to produce revenue for school trust beneficiaries and we support selection of this alternative. The department also acknowledges and concurs that Alternative 5 is reasonable consideration given de-listing uncertainty. The preferred alternative is highly compatible with DNRC's forest management direction to manage for healthy and biological diverse forests and recently adopted Forest Management Rules. In particular, the DNRC supports the FWP's position that since specific habitat corridors, travel restrictions, or area closures were not necessary to restore wolf populations they should not be necessary to conserve and manage a recovered population. The alternative also provides important considerations useful for DNRC's ongoing development efforts for an HCP to

address forest management activities on forested school trust lands. With ongoing state budgetary considerations we acknowledge the need to seek considerable funding for long-term monitoring and management need.

L0327: GYC supports and amended alternative 3. We are supportive of many of the provisions in alternative 3, including the fact that there are no artificial limits on wolf numbers and distribution. This most closely squares with the way that other wildlife populations in the state are managed. We also appreciate the fact that this alternative changes the definition from packs to successfully breeding pair. This measure will more adequately and appropriately measures reproduction than defining goals through pack activity. We would like assurances that the entirety of the program be funded prior to its implementation. We are concerned that the state could end up in a situation where the plan is only partially funded, and some of the more important components of the plan, such as the I&E work, is not completed. GYC supports the notion of a federal program that would fund recovery activities for both grizzly bear and wolf recovery, and we urge the state to aggressively pursue that program in coordination with the other two states. We would like to see a strong commitment to working closely with the states of Idaho and Wyoming in the context of implementing the state plans in a coordinated fashion. Because this is one population, which spans three states, close coordination between management activities in each state will have a profound impact on management. We are gravely concerned about the direction that Wyoming's draft plan has apparently taken. We appreciate the role that the state of Montana has played in this controversy. We strongly urge the state to keep up these efforts, as Wyoming's plan as currently written is biologically and legally insufficient. We urge a strong coordination function between the states, tribes and federal agencies. This could take the form of, at a minimum, an annual coordination meeting where habitat and populations issues can be addressed. This will also provide an opportunity for members of the public to address specific concerns to the agencies and learn current status of the wolf program. Appreciate the fact that the DEIS stands by the need to protect wolf habitat, and highlights the need for connected populations. We also understand that the state has a limited legal role in management of Federal lands. However, it is clear that the state has a great ability to influence decisions regarding to wildlife habitat on federal land. We would like to see some specific language in alternative 3 that commits the state to a strong effort to protect key wolf habitat and linkage areas. We also agree with the state's proposal to allow wolf dispersal through natural means. We do not at this time favor human interference in wolf dispersal, either through augmentation or premature removal. Important that the allowance of permitted citizen take of wolves be assessed along with overall population status. We urge that private take of wolves be limited to killing a wolf when it poses an immediate threat to livestock until the population goal of 20 breeding pair be met. We also ask that any wolf kill permits be limited to offending animals. In addition, it is critical that non-lethal control methods be emphasized. While we do appreciate this provision in alternative 3, we would like to see a strong commitment to a step-down process with the first series of actions focused on non-lethal means with lethal take as a last resort. Threatening to kill a person or livestock. We ask that the latter category be clearly denied so that wolves are only taken in those situations where it is clearly warranted. Support alternative 3's target of 20 breeding pair as a requirement to transition from conservative to liberal management. Critical that the state maintain its commitment to a well-distributed and biologically connected wolf population. Wolf distribution should be a primary consideration when the state considers control or removal. Alt. 3 drops the notion of a compensation program. Instead of dropping the idea altogether, we urge the state to hold it open as an option for addressing verified losses. We do support the notion of preventative action that will minimize losses. However, we feel that the state should still consider a compensation program for verified losses. GYC strongly supports the state's commitment to education related to living with wolves and we also emphasize the need for long term strong enforcement related to wolf management.

We are greatly concerned about the continued reduction of multiple-use, motorized access and motorized recreation opportunities on public lands and feel that this trend is grossly out of step with the needs of the public. The concept of non-use or limited-use of all public lands is not in line with the needs of the public and the laws governing these lands. The project lands were designated as multiple-use lands. Management for multiple-use is responsive to the needs of all citizens including motorized recreationists. We are concerned that the Montana Wolf Program will be another initiative used to close more public lands to the majority of public visitors. The trend of closures after closure and the associated cumulative impact are no longer acceptable. Motorized access and motorized recreation opportunities are very important to our group and many other visitors. We request that all reasonable motorized access and motorized recreational opportunities within Montana remain open to the public and that the Montana Wolf Program not contribute to the cumulative impact on public access and recreation.

L0355: We are greatly concerned about the continued reduction of multiple-use, motorized access and motorized recreation opportunities on public lands and feel that this trend is grossly out of step with the needs of the public. The concept of non-use or limited-use of all public lands is not in line with the needs of the public and the laws governing these lands. The project lands were designated as multiple-use lands. Management for multiple-use is responsive to the needs of all citizens including motorized recreationists. We are concerned that the Montana Wolf Program will be another initiative used to close more public lands to the majority of public visitors. The trend of closures after closure and the associated cumulative impact are no longer acceptable. Motorized access and motorized recreation opportunities are very important to our group and many other visitors. We request that all reasonable motorized access and motorized recreational opportunities within Montana remain open to the public and that the Montana Wolf Program not contribute to the cumulative impact on public access and recreation.

Monitoring

Summary of Comments: These comments address how and at what intensity wildlife managers will monitor wolf populations, pack sizes, pack locations, locations of individual wolves, and the status of prey populations. Some comments say that the proposed "social group" definition is not stringent enough whereas other comments encourage FWP to use the more general definition of "social group" at the outset rather than the federal recovery breeding pair definition. Some comments say that indicate that the Monitoring section of the preferred alternative did not contain enough detail on methodology.

Response: Under the preferred alternative, FWP takes on the primary responsibility to monitor the wolf population, although collaborative efforts with other agencies, universities, and other interested parties will be important. FWP will coordinate with adjacent jurisdictions to monitor boundary packs, whether tribes, NPS, other states, or provinces. This type of coordination already occurs for other wildlife species. FWP intends to work with Idaho and Wyoming to clarify which state counts which wolf packs within the context of their state's management plan so that all packs count toward

the tri-state recovery requirement and that individual packs are not missed or counted twice. Furthermore, FWP clarifies that boundary packs should always count toward the 30-breeding pair total for recovery and delisting purposes and that management authority and responsibility are actually shared between Montana and its neighbor, whether state, federal, provincial, or tribal. For the purposes of Montana's adaptive management program and contribution to the tri-state total, FWP will tally breeding pairs that den within Montana's state boundaries. If the actual den site is unknown, Montana and the adjacent state could seek an agreement on how the pack would be counted, using professional judgment or the assignment given by USFWS at the time of delisting.

As described in the preferred alternative, FWP will estimate wolf numbers and pack distribution, document reproduction, and tabulate known mortality. FWP will also tabulate the number of breeding pairs meeting the federal recovery definition. Ecological understanding will also stem from documenting territory boundaries, the locations of wolf den and rendezvous sites. While the monitoring program will track specific parameters and trends, wolf monitoring data will also be interpreted within the context of other wildlife management objectives related to prey species. The monitoring program will balance scientific precision with cost effectiveness. While telemetry is expensive, it will be an important tool in FWP's monitoring effort.

FWP will use a variety of tools including radio telemetry and non-invasive techniques to gather data on the wolf population in Montana. For additional discussion on monitoring protocols, the reader is referred to the Monitoring sections in Chapter 3 and Appendix 1 in the Final EIS. Those pages are from the Wolf Management Planning Document based on the work of the Montana Wolf Management Advisory Council. In choosing the Updated Council Alternative as the "preferred" FWP is endorsing the work and recommendations of the Council. Additional language has been added to the Monitoring section of the Preferred Alternative to help clarify and address comments regarding the monitoring program and the proposed "social group" definition vs. federal recovery definition breeding pairs.

Representative Comments:

W29: How are state line packs counted and by whom?

W346: Breeding pair numbers should not be the only criteria; should have a benchmark total number of wolves.

W335: Do total wolf numbers include National Park wolves?

W599: It will take a lot of money to monitor packs.

W1290: Average pack size needs to be addressed (4vs. 20) – definition of a pack.

W1228: Concern over how breeding pair is defined and utilized – does not take into account the number of wolves in an area or the biology of wolves – e.g. lose one alpha male or female in the fall becomes not a breeding pack even though likely a new mate will be secured and new pups produced the following spring.

W1384: Concerns about biologist work load – not in the field to monitor wolves.

W1464: Get private groups, university professors and students involved in collecting information on population numbers and how to discourage wolves before they become a problem.

W1383: On monitoring, do you give accreditation to private sightings, information? Alternative #2 – but needs to improve monitoring to include private input.

W96: Could be more or less than counts estimate.

W243: If wolves are not radio-collared, how do we know how many are out there?

W438: State needs to be responsible to landowner to notify when wolves in vicinity.

L0248: Thank you for the opportunity to comment on the Montana Gray Wolf Conservation and Management Plan. The MFBF has been involved in the wolf introduction and management since the beginning of the program and took an active role in the development of this plan. Our comments consist of some general observations based on policy that is developed by our members and some specific comments on the various alternatives.

Montana Farm Bureau members have developed two policies over the past several years that drive our position on wolf management. Those policies are, 1) We support the removal of wolves from the Endangered Species list and placing them under the supervision of the states where they are found, and 2) We support compensation for probable wolf damage by the appropriate state or federal agency. Under these policies Alternative #2, 4 and 5 would appear to be acceptable to MFBF. Our comments will be limited to those alternatives.

Alternative #2

Alternative #2 seems to be the most likely of the acceptable alternatives to remove wolves from the endangered species list so would be the alternative that MFBF supports.

Alternative 2 states, "As the Montana wolf population becomes more established, through the monitoring program, Fish Wildlife and Parks (FWP) will evaluate a more general definition of a social group (four or more wolves traveling in winter) as a potential proxy for a breeding pair." At what point would the more general definition apply? These small "social groups" are sometimes the most detrimental to livestock producers. We would prefer to use the social group designation from the outset.

Alternative 2 states that, "Some funding could come from monies FWP already provides to Wildlife Services for animal damage management in cooperation with Montana Department of Livestock." We are concerned that these monies do not in any way affect the current program dealing with coyotes and would like some assurance that the money referred to in the plan are new dollars dedicated to wolf management.

This alternative also addresses the need for a compensation program. Although we support a federally funded compensation program Montana's top priority should be getting federally funded management programs in place that give livestock producers the flexibility to address problem wolves in a manner that best protects them or their property and yet assures that they remain off of the endangered species list.

Alternative #4

Alternative 4 on its face seems the best solution for wolf management from the livestock producer aspect. Our apprehension is that the cost of this management plan could far exceed the cost of Alternative #2. This alternative proposes that management be turned over to the state and yet the federal government would be expected to entirely fund the program. In addition wolf numbers would be managed on the knife-edge of the requirements of de-listing so unanticipated occurrences such as disease, drought or hard winters could tip them back into the endangered listing. If the USFWS does accept such a plan we are stuck with management continuing under the ESA and/or substantial additional cost to the state.

Alternative #5

Montana Farm Bureau and other livestock organizations worked very hard and in good faith to develop a plan that they feel addresses their concerns and yet gives pro-wolf advocates the comfort that the species will continue to exist on the landscape. All of this work could be negated and the entire process placed in jeopardy if lawsuits are allowed to derail or significantly slow the implementation of wolf management. It is vital that Alternative #5 be in place as a fall back plan in the event the above-mentioned lawsuits occur and de-listing is held up for an indefinite period of time in the courts.

We appreciate the hard work that has gone into the development of the Montana Gray Wolf Conservation and Management Plan and thank you for the opportunity to comment. We look forward to working with the Montana Department of Fish Wildlife and Parks in the future in moving forward the wolf de-listing process as expeditiously as possible.

L0317: Alternative #2 is the best alternative to remove wolves from the endangered species list. Some items of concern though: How are transient packs, moving in and out of Idaho and Wyoming and Canada, to be treated in counting? When will the more general definition of a social group as a potential proxy for a breeding pair apply? These social groups are sometimes the most detrimental to livestock producers. The use of the social group designation should be at the outset. Funding should be from new dollars dedicated to wolf management. The compensation program is not a good plan when getting federally funded management programs in place that give livestock producers the flexibility to address problem wolves that best protects producers and their property and assures that wolves remain off the endangered species list is better. It is vital that alternative #5 be in place as a fall back plan when lawsuits are filed that would allow derailment or significantly slow the implementation of wolf management.

E91: 1. I support Alternative 4. I believe this alternative more accurately recognizes the economic impact wolves have had on agriculture hunting and other land based businesses that have formed Montana since its statehood. While expensive I believe a program similar to the National Park Service's fee-demo program would fully fund both management and compensation to livestock producers. If all visitors to Montana's national parks/landmarks/national wildlife refuges (including Yellowstone National Park which is in all 3 recovery states) were assessed a wolf management fee of \$2-\$5 Montana would not have to pay for management. Remember it is the public that wanted wolves in the first place. It is my belief that this public were largely visitors to Yellowstone National Park and Glacier National Park. Make them pay for recovery. 2. In developing alternatives I believe Montana spent a lot of time developing alternative 2 but relatively little time in developing alternative 4. I would like to see alternative 4 integrated with many of alternative 2's characteristics including flexible management hunting and restitution. I think the final EIS should recognize that there are many packs not yet located or found. For this reason while alternative 4 sets a 10 pack minimum there are probably at least 5 more packs undiscovered. I believe every effort should be made to ensure that there is not an excluded zone surrounding Yellowstone National Park where kill permits cannot be issued or wolves cannot be harvested by licensed hunters/trappers. I don't think we should continue to count packs by pack numbers. We need to devise a more realistic method of counting wolves. Many packs when in wildlife rich areas generate 2 or 3 litters a year. Thus a pack can sometimes have 25-40 wolves. This could be the size of 5 or more smaller packs. Also by current pack standards pack consists of an Alpha Male Female and two pups of the year. Often the alphas are killed another beta animal steps in as Alpha. Thus by counting wolves rather than packs we more reasonably ensure the number of wolves.

Other Wildlife

Summary of Comments: These comments address wolf interactions with other, non-ungulate wildlife species (e.g. ESA-listed species, other carnivores). Some comments mentioned concerns about the effects of predation on prey species by other carnivores (lion, bear) in addition to wolves. Another comment points out additional published literature on wolf-coyote interactions that FWP was not aware of.

Response: Despite volumes of published literature on gray wolves, there is remarkably limited evidence on the precise nature, degree, and mechanisms by which wolves affect and/or interact with their ecosystems, ecosystem functioning, other species of animals, or vegetation communities. The "Affected Environment" description in the Draft EIS describes some research results from the northern Rockies. Current ongoing research in Yellowstone National Park and elsewhere will help resource managers improve their understanding of these complex relationships.

Under the preferred alternative, the gray wolf would become integrated into FWP's wildlife management program as the species integrates itself back into the natural environment. Overall, FWP's program seeks to conserve and manage wildlife from an ecological point of view rather than focusing on single species. Recognition of ecosystem functioning is also important. The adaptive management framework will help FWP incorporate new knowledge into the management program as it becomes available.

While FWP is moving toward an ecologically based wildlife management program, preparing individual species management plans will still serve as an important systematic and strategic way to consider a species and its management within the broader context of its environment and the management objectives of other species. FWP completed a management plan for grizzly bears in southwestern Montana and is working on a plan for the rest of the state. There are statewide management plans in place for black bears and mountain lions. Revisions of the black bear and mountain lion management plans are scheduled after current research studies on these species are completed between 2007 and 2009.

Representative Comments:

W67: Would be nice if the plan specifics included other predators, not just wolves.

W303: Mountain lions are additional predators.

W210: Coyotes vs. wolves – wolf is a killer, coyote is a scavenger.

W739: I think the wolf population should be considered in controlling other predator populations like coyotes/lions.

W752: Since wolves have been introduced into Yellowstone, the other species have enhanced overall.

W940: Wolves have effects on other predators.

L02The Montana Chapter of The Wildlife Society welcomes the opportunity to provide comments on the draft Environmental Impact Statement (EIS) for the Montana Wolf Gray Wolf Conservation and Management Plan. Overall, the EIS is well written and the alternatives appear to capture the spectrum of public concerns. We would like Montana Fish, Wildlife, and Parks (FWP) to consider Comments on Chapter 2

- Wolf diets were specifically addressed in a recent publication that may help address the food habits section. This is also relevant to paragraph 2, page 38, for proportions of each ungulate species in wolf diets. See W.M. Arjo, D.H. Pletscher, and R.R. Ream. 2002. Dietary overlap between wolves and coyotes in northwestern Montana. *J. Mammalogy* 83:754-766

- Interactions with other carnivores: Although this chapter explains some of the research on interaction of wolves with other predators, when it comes to describing the effects on wildlife in the alternatives, some things are overlooked. This is clarified more according to the alternatives. In addition, a peer-reviewed reference for wolves killing coyotes can be found in Arjo, W.M. and D.H. Pletscher. 1999. Behavioral responses of coyotes to wolf recolonization in northwestern Montana. *Canadian Journal of Zoology* 77:1919-1927.

Comments on Chapter 3

- It is understood that in writing an EIS you have to address something close to a "No action alternative", but is Alternative 1 even plausible? Once the wolf population reaches the management goal, doesn't USFWS have to start delisting and at least downlisting? Hasn't the process already started? If the delisting occurs, will this alternative stay in the wolf EIS?

Alternative 2

- Although Alternative 2 is a summary of the Wolf Planning Document, you might want to consider adding some more information on methodology (i.e. determining wolf numbers), within the text of Alternative 2. There is a concern with relying on track counts for determining wolf numbers. It appears that this will be the main method in determining wolf populations. Some collars may be maintained from previous research projects, but no additional effort will be made to monitor packs. So much variation occurs when tracking animals including wolves following in footsteps so that one track is actually 10, the same wolves covering kilometers of land which may run the risk of being counted twice, or a bad winter (like 1994-95) with little tracking snow. It would be beneficial to see some more detailed methodology put in if possible.

- Pg 73, paragraph 2: Unclear what numbers actually define when wolf numbers need to be regulated or are no longer "in need of management". The paragraph above states 15 breeding pairs, but for how long? Or is it management on a year-to-year basis?

- The explanation for how the three states were going to count the boundary packs was well done. Again, without collars, how are dens going to be documented, and hence reproduction?

- Pg 74, paragraph 4. The last two paragraphs in this section might be better up front. On page 73 legal harvest is mentioned, and then the sections reverts back to stating that it is illegal to kill wolves. This is a bit confusing.

- Prey populations: Will ungulate herds be monitored to determine cause of death? Otherwise, with an increase wolf population, comes additive mortality to ungulates. If ungulate populations decrease, what is to say that lion or bear populations, or a combination of all predators is really the cause?

- Monitoring: Same concern as previously voiced on how to adequately monitor natality and mortality.

- Other wildlife: In this section should the effects on lions (hunted species) and grizzlies (threatened species) be more fully explored? For instance, the work in the North Fork documented wolves killing cougars, which may cause a decline in the population and therefore less available cougars for hunting. In addition, there are a couple of instances where grizzlies no longer hibernated because of available wolf kills.

Alternative 4 -- •Wolf management, Numbers, and Distribution: In Alternative 4 artificial zones are established to prevent colonization of eastern Montana (because of possible increased livestock conflicts?). Without a map of the regions to know where the boundaries are, does this still maintain an adequate corridor between Montana, Canada, and Wyoming populations?

Comments on Chapter 3

Alternative 2 -- •Livestock depredation: This notion of wolf populations growing at a "higher" or "lower" rate, does that just mean when they meet the 15 breeding pair requirement?

- Fiscal Impacts: Revenues from a regulated harvest may take awhile before available. Hopefully other monies can be found in the mean time.86:

E23: 1. I support Alternative 3 because it makes the wolf a species in need of management providing full legal protection for wolves. It has the highest population benchmark before aggressive management tools are used set at 20 breeding pairs. It sets clear and specific rules for when citizens can kill wolves that are threatening people pets and livestock. 2. Please consider these statements in choosing your alternative. Wolves promote healthy big game populations. They generate \$20 million in tourism. Wolves manage coyote and other predator numbers and they cause less than one percent of all livestock losses annually. Thank you.

E96: 1. The best choice and the one which I ask FWP to adopt is Alternative 3. The reason is that it insures the highest number of breeding pairs of all the 5 alternatives being considered by FWP. Alternative 3 best represents the chance for Montana to have a healthy and viable population of wolves. I believe it is critical that the State of Montana have the largest number of wolves feasible for the following reasons: 1. Wolves promote healthy big game populations and cull the weakest from among the ungulate herds. this fosters better big-game populations. 2. A higher wolf population means an increase in tourism and this promotes the State's economy. There is ample evidence that this will occur by virtue of the experience seen in Yellowstone National Park. 3. According to the 2002 Montana Agricultural Statistic Service report wolves are responsible for less than 1% of all livestock losses in the state. For the past 7 years over twice as many sheep have been lost to turtling (which as I understand it means rolling over in the rain and not being able to get up than have been lost to wolves. Wolf predation on livestock represents less than one-thousandth of one percent of the total number of head in Montana. 4. Increased wolf populations promote a better balance in the carnivore community as evidenced in Yellowstone Park. In Yellowstone the presence of wolves has resulted in a more diverse predator and scavenger community. 2. Alternative 3 could be improved by increasing the number of breeding pairs upwards from the 20 in Alternative 3 to 25 pairs. Also that trapping of wolves be absolutely prohibited because it is so grossly inhumane.

Hybrids

Summary of Comments: These comments identify a concern about whether captive wolves or wolf-dog hybrids jeopardize human safety if they are released or escape from their owners, erode public tolerance for wild wolves if someone has an encounter with an escapee, whether hybrids or captive wolves pose a risk to a recovered wolf population. Most of the comments FWP received on this issue support stricter laws and oversight to further regulate or outright ban ownership of captive wolves or wolf-dog hybrids.

Response: Montana law assigns regulatory oversight of wolf-dog hybrid or captive wolf ownership to FWP. It is legal to possess captive wolves and wolf-dog hybrids in Montana. Citizens may keep them as personal, private pets without a permit. Citizens wishing to public display captives or wolf-dog hybrids or to attract trade must have a permit from FWP. Montana statutes (87-1-231) and administrative rules require the permanent tattooing of any wolf held in captivity, where "wolf" means a member of the species Canis lupus, including any canine hybrid which is one-half or more (>50%) wolf. Owners are also responsible for compensation and damages to personal property caused by any wolf that is held in captivity or that escapes from captivity. FWP Enforcement Division maintains the database of tattooed captive wolves and wolf-dog hybrids.

As stated in the preferred alternative, FWP does not seek to further regulate the ownership of captive wolves or wolf-dog hybrids at this time. However, in the future, the State of Montana may seek that statutory authority in the interest of public safety. FWP outreach efforts will include identification techniques to help citizens discern a hybrid or captive wolf from a wild wolf. FWP biologists or game wardens will assist local authorities in making that determination and provide the appropriate management support to local authorities.

Representative Comments:

W266: For hybrid wolves, the breeders should need to buy a license and animals should be marked by an ear tag.

W1307: Under all alternatives, no tolerance for wolf hybrids.

W1346: I like Alternative #2 with 20 pairs or Alternative #3 with compensation. Need to deal with hybrids.

L0206: Alternative #2 will not only insure the future of wolves in Montana but also protect user groups with interest that may conflict with wolves, from undue harm. Budget for managing wolves is unrealistically high. We would like to know what FWP plans to do if money cannot be obtained from private or federal sources. The inadvisability of private hybrid ad wolf ownership should be addressed in your public outreach programs including plans to prohibit such ownership through regulatory means if problems involving these animals running loose continue. Uncomfortable with compensating livestock owners for depredations, they are not compensated for deaths caused by other predators. Should be linked to owners who employ proper husbandry practices.

Human Safety

Summary of Comments: These comments identify Montanans' concerns about the safety of their children, pets, and their livestock in the presence of a recovered wolf population. Many comments also specifically mention wolf proximity to rural homes or out buildings and wolf habituation as a concern.

Response: In recent years, FWP has taken a proactive approach in helping people learn how to live, work and recreate in wildlife habitats. Other state and federal agencies have done the same. Increasing numbers of people are living within the urban – wildland interface where a potential for conflict with a wide variety of wildlife species exists. Through policy development, public outreach and technical assistance to landowners and recreationists, FWP is working towards mitigating those risks to the extent possible. The reader is referred to pages 84-85 in the Draft EIS for the specific management responses. The spectrum of management and public outreach activities to ensure public safety in Montana addresses these comments.

In accordance with Montana statutes, FWP and the FWP Commission are authorized and charged with the duties of protecting people and personal property from damage and depredation caused by wildlife. In the context of livestock, those responsibilities are shared with the Montana Department of Livestock. FWP defines a public safety problem related to carnivores as: any situation where an FWP employee reasonably determines that the continued presence poses a threat to human safety, an attack has resulted in the loss of livestock or personal pets, or that a human has been physically injured or killed.

As described in the preferred alternative, FWP intends to reduce the potential for wolf-human conflicts and minimize the risks of human injury due to any large-sized canid. While the risk of an aggressive encounter with a wild wolf is low, FWP believes that the risk goes up in the absence of proper management. Management experience elsewhere demonstrated that wolf habituation (loss of fear or food conditioning) might be a contributing factor to wolf-human interactions resulting in human injury. Whether or not habituation escalates to an immediate threat to human safety may hinge on a prompt management response by the management authority. FWP will utilize extensive outreach to inform the public, aggressively discourage habituation of wild wolves, and respond to conflicts.

Upon delisting from the state and federal lists, a person could kill a wolf if the wolf is “attacking, killing, or threatening to kill” a person or livestock when there is an immediate and direct threat (87-3-130, MCA). Dogs used to herd or guard livestock are discussed within the Livestock section. This statute also allows a person to kill a wolf if it is “attacking or killing a domestic dog” where dog in this passage refers to domestic pets or hunting dogs (bird dogs or lion hounds). The Montana Legislature would need to amend statute 87-3-130 in order for a person to kill a wolf if it is “threatening to kill” a pet or hunting dog.

Representative Comments:

W151: Wolves have become habituated to humans here because it is illegal even to haze them.

W152: Wolves in the Ninemile are habituating to gunshots and come to gut piles.

W153: Deer live in peoples' yards; wolves follow and then find llamas etc.

W326: Management plan needs to address public safety.

W518: I bet that with enough time and enough wolves they'll kill someone's grandkid; a Wolf in Alaska at a lumber camp dragged a kid off. The kid survived and they killed the radio collared wolf.

W697: People need to be able to harvest a wolf that has come into their yards and are endangering family, livestock and pets.

W897: There is inherent risk in anything we do.

W1198: I am concerned about all habituated animals.

W898: Dogs not livestock – I want to protect my dog from wolves legally.

W877: Wolves have attacked people in North America and killed them – on 1806, July 26 – Lewis and Clark Expedition

W696: They will come into people's yards. They need to be managed accordingly.

W1197: If wolves lose their fear of man, it will be a problem.

L0272: We have never seen a wolf so why do we need them? Grandfather told of wolf packs chasing teams and wagons with families running for their lives. If you want to see a wolf, put them in a locked-up zoo or park.

L0282: Last year and this year you incorrectly stated that outfitters are under the jurisdiction of the Dept. of Commerce. See pg. 2 of present report. Wolf history continues to be very bad on pg. 3. Pg. 6 wolves have never been extinct in Montana. Pg 13 History of wolves in Montana is highly inaccurate. Wolves were present in Glacier National Park many years prior to 1979 and 1986. See Singer 1975. Pg. 14 the number of wolf packs for the Great Bear, Rocky Mountain Front, Bob Marshall and Scapegoat Wilderness areas seems to be extremely low at only two or three. Most of the wolf history from USFWS dates from 1979 with only one from 1975. You should have more in the 1936 -1979 period, which you have basically ignored. Pg. 18 wolves were present before the 1980's in Glacier Park and the Rocky Mountain Front and South West Montana. On pg. 20 you do not mention the possibility of Alaska wolf genetics being present in the YNP area from the first plant of wolves. You do not mention the number of big game animals that will be taken in a year by a certain number of wolves. This is a very important issue in Montana and you have ignored it. Wolf-human encounters are inaccurately reported on pg. 56. Again you only briefly mention rabid wolves and they will probably occur in Montana again in the not too distant future. I cannot stress too strongly that many of the wolf attacks reported could have been human kills had not a suitable weapon been available to kill the wolf or wolves. On pg. 73 you say a regulated harvest of wolves will do many things. Have you looked at Alaska and Canada to see how hard it is to kill the necessary number of wolves to regulate a population? The 72-hr reporting requirement should be kept for wolves and perhaps extended for all species. You wonder why people quit buying hunting licenses. The above is just one more nail in the license coffin. I can remember when we had some common sense and freedom in this state. On pg. 87 you need to re-think the management of predatory species on winter big game ranges. Having invested much effort, money and time in our state wildlife management areas for ungulates we should not let them be ripped apart by too much predation or harassment. Also nowhere in this report have I seen the value of meat produced by wild animals for people in Montana. Having survived for several decades on wild game I see the value of the meat. For many Montana people hunting is more than recreation. Refer to page 124 on State Game Ranges. On page 123 the use of the term breeding pair appears to bias the number of wolves and wolf packs present. You should just try to count wolf packs and even then you will not be counting all the wolves or packs. Also lone wolves and pairs apparently aren't counted. On the top of page 125 common sense has again deserted you. If wolves have to be reduced to lessen ungulate mortality it does not necessarily follow that hunters should suffer also. It appears you want to create a wolf management bureaucracy. We know that we have plenty of bureaucrats in Montana today. They are even more numerous than wolves. Hire the best, experienced ungulate (deer and elk at least) and wolf person you can find to supervise the field program. You already have four or five bear specialist, train them to work with wolves in winter. They can work with wolves at other seasons also. Skip hiring the extra wardens.

E14: 1. I would like to see 15 breeding pairs or less and I would like to see them managed like black bears and mountain lions. 2. My biggest concern is my hound dogs. I know of several hound dogs that have been killed by wolfs in Montana and Idaho. Your own statistics show your third largest group of domestic kills are dogs. 108 cattle 220 sheep and 21 dogs. You are saying that it is ok for a rancher to protect his 400.00 calf and his guard dog but I can not protect my hound dogs. Which can be sold for thousands and are irreplaceable to me. I think anyone should be able to protect his dog know matter what kind.

E74: 1. Alternative 4. Less impact on other wildlife and danger to human welfare. 2. Change Alternative 5 to predator control if delisting does not occur.

Wildlife Management Areas

Summary of Comments: These comments address wolf presence on FWP Wildlife Management Areas (WMAs). Although few in number, most comments specifically question the appropriateness of wolf use of these lands because they were purchased using license money.

Response: FWP manages a network of WMAs across the state to benefit wildlife, particularly wintering ungulates in western Montana. Other WMAs provide upland habitat for waterfowl and upland game birds. In addition to providing wildlife habitat and open space, WMAs are also used by the public for outdoor recreation such as big game hunting, bird watching, wildlife viewing, fishing, camping, or bike riding. On some WMAs, FWP leases livestock grazing rights to private landowners in a coordinated, systematic program that accounts for the needs of wildlife, livestock, and vegetation.

Montana has had a wildlife habitat acquisition program since 1940, but the funding sources were not stable. As a result, the 1987 Montana Legislature established that a portion of hunting license dollars would be earmarked as a stable funding source for wildlife habitat protection. In 1995, the FWP Commission adopted a Statewide Habitat Plan. Although fee title acquisitions remained an option, greater emphasis was placed on use of conservation easements, management agreements, and leases. It is true that state license revenue and matching federal funds are used to secure these interests in wildlife habitat, as well as for maintenance of the properties. FWP also points out that there are also guidelines established by USFWS for how FWP spends matching federal funds. FWP does not want to jeopardize its ability to qualify for those funds.

FWP acquired some WMAs lands through fee-title purchase using a variety of funding sources. Examples include earmarked revenue from non-resident and resident license fees, surplus federal monies (Pittman-Robertson), proceeds

from auction of moose and bighorn sheep licenses, proceeds from the state waterfowl stamp, and mitigation funds from hydroelectric development projects. Other WMAs were acquired by FWP because private individuals donated them.

FWP acknowledges that under the preferred alternative that a wolf pack will be able to incorporate WMAs within its territory, consistent with the philosophy that mountain lions and black bears inhabit these lands, too. It would not be practical, nor feasible to zone wolves off WMAs. FWP also acknowledges that wolf use of WMAs during the winter period may result in displacement of wintering ungulates to neighboring private lands where they may cause other conflicts. Ongoing research has demonstrated that wolf presence or predation events can affect elk habitat use and distribution. FWP will work collaboratively to address this situation and resolve any conflicts, but will generally not remove individual wolves or wolf packs from WMA lands.

Representative Comments:

E72: 1. After reading your list of compiled comments the FW&P preferred management plan summary the complete list of Questions and Answers and considering my 50+ years of hunting fishing camping reading etc. I arrived at the following conclusions and attitudes about wolves in Montana: 1) The only way to successfully manage wolves is by direct control of their numbers. Our forefathers and settlers of Montana had it right the first time. They knew that people and agriculture came first and that any management plan that did not recognize these basic facts threatened their existence as viable families and communities. Thus they managed wolf problems with gunpowder and steel traps. Sadly many now think that we can set the clock back ignore what history has taught us about wolf behavior and make room for them as if the last 150 years of white man's presence in Montana is of little or no significance. 2) If I am forced to accept the wolf presence in Montana without the bought with blood right to vote on the issue which appears will be the case as our Federal wildlife managers have already done this then I would recommend the following: a) without adequate funding in our State FW & P (we are a poor state you know) leave all costs with the Federals as they started the problem. Let them finish it. To hand this tragic mistake off to the Montana taxpayers and our own respected wildlife managers is just another betrayal. Let them fight over funds for the wolf in Congress at least I have some impact there when I go to the polls to vote. b) if the vocal minority of wolf lovers tree huggers and other misguided animals before people groups want free ranging wolves in Montana then tell them to put their money where their mouths are and pay for the privilege. c) if funding is found (without stealing from our hunting and fishing license funds) to hire and sustain a State wolf management department then let them manage the wolf as a big game animal and a furbearer. This would bring in considerable revenue and would apply the most efficient form of wolf control known which is trapping. The wolf pelt makes a pretty good dust catcher on your floor or on your wall. 3) Most Montana citizens highly value the decades of effort and millions of dollars that sportsmen and others have put into building up our game populations and habitat. The very real threat of losing much of these populations to increasing numbers of free ranging wolves with big appetites and killer instincts is a travesty to say the least. 4) Our WMAs are extremely vulnerable to wolf predation. Without them as solid protection for sustaining our big game herds all people of Montana will lose out one way or another. 5) Without quick and deadly control of wolf numbers there will be an across-the-board loss of confidence in our State Big Game Management systems even though they had little or no part in promoting wolf reintroduction. This would likely start a downward spiral of big game hunter support and a marked decrease of sales of hunting licenses. 6) An earlier comment to FW&P said Manage people and not wolves. That is the root attitude (based on feeling and not common sense or experience) of persons who have put the interests of the wolf ahead of human welfare. In effect they desire to change the Face of Montana at the expense of our big game herds and those that support them year in & year out. So far they are winning! They have managed to dump an unwanted wolf problem into our back yards and now they want to force us to live with it under their choice of rules. The best interests of the Montana citizen or our game herds has nothing to do with their emotional drive and zeal to see this gut ripping ham stringing carnivore living a protected existence in Montana. It is no wonder that many are willing to utilize the Three S system of wolf management - Shoot Shovel and Shut Up. 2. I apologize for not following the instructions on this page and answering the questions. I could not find the five alternative Plans on your web site so could not address them. Please excuse my poor spelling. My Spell Checker does not work on this document. I realize that Montana would be better off if our FW&P had control of the wolf population and were left alone to manage them as big game animals. I doubt that this will happen because of all the adverse publicity and political pressures brought on by the emotional and misguided wolf lovers. Most of these pressure groups are from out of state and we seem to have lost our resolve in State politics to stand up to their foolish game management ideas and do what is best for our citizens and our game populations. For example our State level leadership was not strong enough to stand up to the same pressure groups that forced our FW&P to go belly up in regards the public hunting of Buffalo and Grizzly Bear. What a slap in the face to the Montana big game hunter and the FW&P! Will we continue to let these animal lovers push us around or will our leadership learn to stand its ground and speak the truth about wise game management? Thank you for the opportunity to make this comment. You have my permission to reprint it for comment purposes.

Information Education / Public Outreach

Summary of Comments: Some of these comments point out the need for FWP to develop information and education techniques and programs to keep Montanans informed about wolf conservation, wolf management, and human safety. Other comments also address the need for technical assistance for landowners and other rural residents. Still others emphasize that a more thorough representation of wolf ecology and how wolves interact with their environment was needed. Many comments note that the outreach efforts described in the preferred alternative were not sufficient.

Response: As described in the preferred alternative, FWP views public outreach as a basic tenet of the program that is very important in addressing the public's concerns about living, working, and recreating in the presence of a recovered wolf population. In the absence of an active public outreach effort, FWP cannot provide informational materials and technical assistance that will help increase social tolerance for wolves in Montana. FWP added more information to this

section of the preferred alternative description. The additional information was taken from the Wolf Advisory Council's Planning Document (Appendix 1 of the Draft EIS).

Representative Comments:

W 48: More education on wolf/people interaction.

W252: Need to show the wolf as the predator he is.

W468: True facts should be put out that wolves don't actually have to kill to cause death of cow/elk – they chase and stress them.

W597: Management plan should include whole public education program to meet goals in Alt#2. When you have to start control efforts, they will not be accepted by the public. Balance includes all uses of prey species, including predators. Will PR funding support animals that are not hunted? Concerns over economic impact to livestock producers.

W730: Would like to see the agency have an active outreach program to prevent wolf/man conflicts similar to our approach with bear management.

W751: A wolf visitor center could be used to help raise money and educate people about wolf conservation.

W1181: Information and education should be a strong part of any state plan.

W1222: The public needs to be informed (especially the public in the areas that may be impacted – ranchers, etc.) when wolves are relocated, introduced, or observed in a formerly unoccupied area.

W1469: More public education on wolf issues. This would solve a lot of the expenses written into this plan.

W2: 1. I don't know. 2. Wolves need to be a part of the ecosystem. Predators are a vital part of a healthy and diverse ecosystem. Maybe we need a People Management and Education Plan in place of a Wolf Management Plan.

W40: 1. #1 and #2. Wolves should be allowed to populate and expand their range. 2. More education from a native American point of view to be required if wolves are hunted/trapped. Wolves are a very powerful animal and they should not be killed without honor, education and a lot of reverence.

L0162: 1) Alternative #2 it seems to best address the concerns of those both for and against the wolves in the wild. I'm very much impressed with the thought, research and dedication that have been applied to all of the alternatives. 2) I would like to see specific penalties for those who would randomly destroy, wolves. Also, a plan for public education regarding wolves, would be wonderful. Ranchers need to know alternative ways to protect their stock (besides use of firearms). Outfitters and hikers need to know how to best protect themselves in the event of wolf/human confrontation and how best to avoid conflicts with wolves.

L0188: My selection of the 5 alternatives is Alt. #1. The removal of federal protection for the gray wolf is premature at this time. In Montana there is significant hostility and fear directed at this species. The local governments of Phillips and Fergus counties have stated that "wolves constitute a menace to society that cannot be tolerated. Dan Fuchs sponsored house bill 283. If this is an example of what the wolves will have to deal with in their struggle to survive it appears that FWP hasn't done the necessary public outreach to assure that when the wolves are delisted they aren't slaughtered and have to be re-listed again. FWP revenue is directly linked to sale of hunting licenses. Since wolf recovery depends on prey species, FWP would be pressured by hunting interest to aggressively manage the wolf population. I don't believe that the state of Montana would actually manage the wolf program at the high range. The livestock industry and hunting interests would never allow that. Since FWP would meet their legal requirements with the low end range, that's what could be expected. The state run wolf management program would undermine and reverse the gains that the wolves have made under federal protection. While I think that the state of Montana should be permitted to manage the gray wolf along with other wildlife species, the draft EIS suggest that they cannot be trusted with that responsibility at this time. Even FWP's preferred alt. 2 relies too much on micro-managing wolves when prey populations drop. Therefore, this delisting process presents a conflict of interest for FWP. To have a more balanced approach to wolf management. FWP could implement revenue raising programs other than selling hunting license. I don't believe that public attitudes have changed that much regarding wolves. They have been brought back into an environment where most people don't know how to live with them. In order for people to accept wolves, their fear and hatred has to give way to more tolerance. Public outreach programs and services might bring that about. But once again, these changes need to occur before wolves are delisted and managed by FWP.

E17: 1. I believe they all address my concern because of the fact that before they were even proposed there was a lack of education on all of the alternatives. I believe that in order to have a strong wolf plan you need public backing and without the proper education on why wolves are important and why wolves deserve a home here in Montana is crucial to the simple integrity and simple stability of Montana's fragile ecosystem. We need education and that includes both young and old so that youngsters can grow up with all the facts in why wolves are important and adults do not base their opinions on basic myths and fallacies. 2. I would attempt to go to the drawing board the only one to me that seems like it will preserve the wolves is the no action alternative. As I said before more education of the public I believe will mean better ideas and a better wolf management plan for Montana.

Private Property

Summary of Comments: These comments address “private property rights”, referring to wolf presence on private property, protection of livestock in the context of private property etc. Some comments assert a landowner’s “right” to allow wolves on his or her property, while others assert a landowner’s right to control or manage wolves on his or her property. Other comments assert a right to protect private property in the context of livestock.

Response: FWP recognizes that tolerance for wolves on private property is important to maintain the long-term security of a wolf population in Montana. While wildlife is a public resource and managed by FWP in trust for this and future generations, perpetuation of Montana’s wildlife also depends on the habitats found on private lands. FWP is aware of its limited statutory authority over private lands and acknowledges that much is asked of private landowners when it comes to wildlife conservation in Montana. Without their willingness to sustain wildlife seasonally and year-round, Montana’s wildlife habitats would be incomplete.

Landowner acceptance of wolf presence and the use of private lands by wolves are both highly variable in space and time. Given the mobility of the species and the extent to which public and private lands intermingle in Montana, it would not be unusual for a wolf to traverse from private to public lands many times in a single day. Private land may offer habitat features or concentrations of wintering ungulates that are especially attractive to wolves so the pack may utilize those lands disproportionately more than other parts of their territory. Certain land uses or management practices may increase the potential for wolf conflict with humans or livestock.

The preferred alternative described that upon delisting when state laws guide citizens and FWP activities, citizens will be able to protect their livestock if a wolf is “attacking, killing, or threatening to kill” livestock, as per MCA 87-3-130. Citizens will also be able to protect their domestic dog if the wolf is “attacking or killing” the dog. Citizens will need to report the incident to FWP within 72 hours. Private property owners retain the right to grant or deny access to their property by FWP, WS or other entities. Private property owners also retain the right to choose whether any wolf management activities or control actions take place on their property.

The underlying philosophy of the preferred alternative is that wolves will be allowed to find their place in Montana’s landscape, yet be managed in an adaptive way that takes into account social tolerance, private property owner concerns, wolf numbers, and landownership patterns. Wolf packs in areas of interspersed public and private lands will be managed in ways similar to other free-ranging wildlife in Montana. FWP remains committed to assisting willing landowners and building collaborative relationships.

Representative Comments:

W281: US citizens have a right to protect our property – dogs, llamas, horses

W508: I disagree with public hunting for trophies, but agree that landowners should be able to protect their property.

W539: I prefer Alternative #4. As a private landowner and taxpayer, if a predator comes onto my property that is a danger to a toddler or a calf, I should have the right to kill it. I should have the same right to protect my property from a wolf just like a rattlesnake. Don’t have time to call an authority. Need to act quickly. If the wolves are here to benefit the whole country, should pay for them. Don’t necessarily trust the compensation program. Doesn’t appear to work for our bull operation. State control but question funding.

W588: I’m not sure I approve of any plans. Because of cost to state and concerns about dens on private property. Dens on private property result in property being wolf habitat.

W1438: Prefer #4 – like the idea of protecting private property. I am concerned that wolf could get relisted under this option. Therefore would prefer #2.

L0068: 1) Alternative #4 because it is designed to allow the least number of wolf predators in the state. The wisdom of our great creator made provisions for predators to control wildlife until enough human beings populated the earth. At such time human beings then would take over the management of wildlife. In some cases predators could and should become extinct! No problem! Such as the dinosaurs they became extinct when their usefulness was no more. 2) Wolf is and should be recognized as a predator any time they are found on private property. They should only be protected when they are in national parks and primitive areas. These alternatives are taking away “rights” of private property without any compensation. This is unconstitutional.

E9: 1. I have not read the alternatives yet I will. My choice to manage the wolf would be any alternative that considers the wolf a predator outside of Wilderness and Park areas (open hunting/trapping) and regulated hunting is allowed within these areas to manage population. 2. Hound hunters are having their dogs slaughtered by wolves. The barking of a trailing dog is attracting the wolves. Stories of hunters finding their dogs brutally ripped to

APPENDIX 5

pieces are very common and on the increase. This is a regular event not an isolated few occurrences. Talk to the hunters especially in Idaho and Western Montana. I for one found more wolf tracks in Southwest Montana than I did lion tracks and not in the heart of the wolf recovery areas either. These things are everywhere. It is only fair that the hound hunter be able to protect his hounds from wolves by any means necessary. If it is proposed that a rancher can protect a \$400 calf or his \$300 ranch dog then it is only right that a hound hunter be able to protect his hounds. A working hound dog has a value of \$1 000 to \$5 000 or more. Typically hunters will run 2 to 5 dogs. Wolves that kill an entire hound pack which is happening can conceivably destroy up to \$20 000-\$25 000 worth of dogs. Where our right to protect our more valuable property? Nobody is reimbursing us. Hound hunters as myself should not only have the right to protect our property; we demand that right!